

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

DOUGLAS DAVIS

Plaintiff,

v.

**SCHINDLER ENTERPRISES, INC., SIMON
PROPERTY GROUP and J.C. PENNEY**

Defendants.

Civil Action

No.:

NOTICE OF REMOVAL

Defendants, Schindler Elevator Corporation, incorrectly designated Schindler Enterprises, Inc. and J.C. Penney Corporation, Inc., incorrectly designated as J.C. Penney, file this Notice of Removal pursuant to 28 U.S.C. §§ 1441(a) and (b) and 1446(b) and (c) to remove this action from the First Judicial District of Pennsylvania, Court of Common Pleas, Philadelphia County, to the United States District Court for the Eastern District of Pennsylvania on the following grounds:

1. This is a civil action filed and now pending in the Court of Common Pleas of Philadelphia County, April Term 2018, No. 02600. The action was initiated in that court by writ of summons. Pursuant to Rule to file complaint, plaintiff filed a complaint on June 8, 2018.

2. On June 22, 2018 defendants Schindler and J.C. Penney filed preliminary objections to the complaint pursuant to Pennsylvania R.C.P. 1028(a)(2) and 1028(a)(3).

3. Rather than file an answer to the preliminary objections plaintiff filed an amended complaint on July 11, 2018.

4. The amended complaint alleges the property was located at the Lehigh Valley Mall, 250 Lehigh Valley Mall, Whitehall, PA 18052.

5. The amended complaint failed to correct the deficiencies in the complaint raised by the preliminary objections to the initial complaint. Therefore defendants filed preliminary objections to the amended complaint pursuant to R.C.P. 1028(f) to obtain the relief requested in their original preliminary objections.

6. Rather than file an answer to the preliminary objections plaintiff filed a second amended complaint on August 20, 2018.

7. Pursuant to 28 U.S.C. § 1446(a), a "copy of all process, pleadings, and orders served upon the defendants in this action" is attached to this Notice of Removal as Exhibit "A".

8. Plaintiff's complaint and amended complaints allege the negligence of all defendants was a cause of his injuries sustained while using an escalator within the J.C. Penney store in the Lehigh Valley Mall on April 24, 2016.

9. At the time this action was commenced in the Court of Common Pleas of Philadelphia County and at the present time plaintiff is an individual residing in the Commonwealth of Pennsylvania and therefore is a citizen of the Commonwealth of Pennsylvania.

10. At the time this action was commenced in the Court of Common Pleas of Philadelphia County and at the present time, Schindler Elevator Corporation is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in New Jersey. Therefore, Schindler Elevator Corporation is not a citizen of the Commonwealth of Pennsylvania.

11. At the time this action was commenced in the Court of Common Pleas of Philadelphia County and at the present time, J.C. Penney Corporation, Inc. is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business

in Texas. Therefore, J.C. Penney Corporation, Inc. is not a citizen of the Commonwealth of Pennsylvania.

12. At the time this action was commenced in the Court of Common Pleas of Philadelphia County and at the present time, Simon Property Group, Inc. is a corporation duly organized and existing under the laws of the State of Delaware, with its principal place of business in Indiana. Therefore, Simon Property Group is not a citizen of the Commonwealth of Pennsylvania.

13. Plaintiff's second amended complaint demands judgment against the defendants jointly and severally for a sum in excess of the arbitration jurisdictional limits in effect in this County, which is \$50,000.00.

14. In an effort to verify the amount in controversy, counsel for defendants reviewed the information produced by plaintiff's counsel on the issue of injuries sustained by the plaintiff and amount of damages demanded by plaintiff.

15. Plaintiff's second amended complaint alleges injuries as follows:

12. Solely as a result of the negligence of the defendants, plaintiff, Douglas Davis, was caused to suffer various physical injuries, including, but not limited to, left ankle injuries, left knee injuries, right knee injuries and right ankle injuries.

13. As a direct result of the aforesaid incident, plaintiff suffered severe shock to her nervous system, great physical pain and mental anguish, all of which may continue for an indefinite period of time in the future. Plaintiff has been compelled to expend various sums of money for medication and medical attention in attempting to remedy the aforementioned injuries.

14. As a direct result of the aforesaid incident, plaintiff has been prevented from attending to his usual duties and obligations, and believes

that he may be prevented from doing so in the near future, as his injuries are permanent in nature.

15. The negligence and carelessness of defendants, Schindler Enterprises, Inc., Simon Property Group and J.C. Penney's has caused Plaintiff to suffer a loss of earnings and loss of earning capacity, and will continue to cause Plaintiff to suffer lost earnings for the remainder of his life.

16. In an effort to determine the type of injuries and amount of damages claimed by plaintiff, defendants served interrogatories and request for production of documents upon plaintiff on May 25, 2018.

17. Plaintiff did not serve answers to the interrogatories and request for production of documents within the required time frame and defendants were required to file a motion to compel and obtain a court order dated July 23, 2018 compelling plaintiff to serve full, complete and verified answers to interrogatories and request for production of documents within twenty (20) days of the date of the order or risk sanctions.

18. After plaintiff refused to comply with the court Order compelling discovery answers defendants filed a motion for sanctions to enforce compliance with the court ordered discovery.

19. In response to the motion for sanctions plaintiff finally served answers to interrogatories and request for production of documents on August 24, 2018. A copy of plaintiff's discovery answers is attached as Exhibit "B".

20. Within plaintiff's discovery answers served on August 24, 2018 plaintiff produced partial records of medical treatment from C. Paul Garabo, D.C. (Lehigh Valley Pain Center Chiropractic and Rehabilitation); the emergency department of St. Luke's Hospital; and St. Luke's

Orthopedic Specialists. Plaintiff complained of pain in both knees and left ankle. After diagnostic testing, including x-rays of the left ankle and both knees and MRI of the left knee, and conservative treatment with physical therapy and ice plaintiff had surgery to his left knee on January 23, 2017. The medical bills produced in plaintiff's discovery answers, which appear to be incomplete, total in excess of \$12,500.00.

19. Without admitting liability for any amount of damages, defendants have a good faith belief that the amount in controversy is an excess of this court's jurisdictional limit. Where a case has been removed, the amount in controversy is generally gleaned from the plaintiff's complaint. *Angus v. Shiley, Inc.*, 989 F.2d 142, 145 (3d Cir. 1993). Furthermore, the estimate should not be based on the "low end of an open-ended claim," but rather on a "reasonable reading of the value of the rights being litigated." *Judon v. Travelers Prop. Cas. Co. of Am.*, 773 F.3d 495, 507 (3d Cir. 2014); *Werwinski v. Ford Motor Co.*, 286 F.3d 661, 666 (3d Cir. 2002) (quoting *Angus*, 989 F.2d at 146 (internal quotation marks omitted)).

20. This notice of removal was filed within thirty days from when defendants received plaintiff's discovery answers which pursuant to 28 U.S.C. § 1446(c)(3)(A) shall be treated as an 'other paper' under subsection (b)(3). Therefore the notice of removal has been timely filed.

21. Defendant Simon Property Group consents to the removal of this action.

22. Because this matter involves a controversy between citizens of different states and the amount in controversy exceeds the sum of \$75,000.00, exclusive of interest and costs, this matter is removable under 28 U.S.C. §1332.

23. Prompt written notice of this Notice of Removal is being sent to plaintiff through his counsel, and a copy of this Notice of Removal is being filed with the Prothonotary of the First

Judicial District of Pennsylvania, Court of Common Pleas of Philadelphia County, as required by 28 U.S.C. § 1446(d).

24. Venue of this removal action is proper pursuant to 28 U.S.C. § 1442(a), because this Court is the United States District Court for the district and division embracing the place wherein the state court action was pending.

25. Defendants Schindler Elevator Corporation and J.C. Penney Corporation, Inc. respectfully reserve the right to amend or supplement this Notice of Removal as may be appropriate.

WHEREFORE, defendants Schindler Elevator Corporation and J.C. Penney Corporation, Inc. respectfully request this action be removed to the United States District Court for the Eastern District of Pennsylvania.

Respectfully submitted,

LUCAS AND CAVALIER, LLC

By: 

Keith E. Johnston, Esquire
Pa. Attorney ID No. 27692
1500 Walnut Street, Suite 1500
Philadelphia, PA 19102
(215) 751-9192

*Attorney for defendants Schindler
Elevator Corporation and J.C.
Penney Corporation, Inc.*

CERTIFICATE OF SERVICE

I, Keith E. Johnston, Esquire, certify a true and correct copy of notice of removal was served by U.S. Regular Mail, Postage Prepaid upon the following counsel of record:

Marc T. Sacchetta, Esquire
Sacchetta & Falcone
308 East Second Street
Media, PA 19063
Attorney for plaintiff

David R. Bronstein, Esquire
BENNETT, BRICKLIN & SALTZBURG, LLC
1601 Market Street, 16th Floor
Philadelphia, PA 19103
Attorney for Simon Property Group



Keith E. Johnston, Esquire

Date: September 14, 2018

EXHIBIT “A”

MARC T. SACCHETTA, ESQUIRE
Attorney I.D. No. 84185
SACCHETTA & FALCONE
308 East Second Street
Media, PA 19063
(610) 891-2797 – Ph.
(610) 891-8421 – Fx.

*This is not an arbitration matter. Jury trial is
demanded.*

Filed and Attested by the
Office of Judicial Records
19 APR 2018 02:38 pm
BRYANT

Attorney for Plaintiffs

DOUGLAS DAVIS
1819 Green Leaf Street
Allentown, PA 18104

Plaintiff

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY, PA
CIVIL ACTION – LAW

v.

SCHINDLER ENTERPRISES, INC.
20 Whippany Road
Morristown, NJ 07960

and

SIMON PROPERTY GROUP
1455 Franklin Mills Circle
Philadelphia, PA 19154

and

J.C. PENNEY
1754 Franklin Mills Circle
Philadelphia, PA 19154

Defendants

PRAECIPE TO ISSUE WRIT OF SUMMONS

TO THE PROTHONOTARY:

Kindly issue a Writ of Summons - Civil Action in the above-captioned matter.

By: /s/ Marc T. Sacchetta, Esquire
MARC T. SACCHETTA, ESQUIRE
Attorney for Plaintiffs

OF COUNSEL:
SACCHETTA & FALCONE
308 EAST SECOND STREET
MEDIA, PA 19063

Summons
Citation

Commonwealth of Pennsylvania
COUNTY OF PHILADELPHIA

Douglas Davis

Plaintiff

COURT OF COMMON PLEAS

Term, 20

vs.

Schindler Enterprises, Inc.
Simon Property Group and J.C. Penney

No.

Defendant

To¹

Schindler Enterprises, Inc.

20 Whippany Road

Morristown, NJ 07960

Simon Property Group
1455 Franklin Mills Circle
Philadelphia, PA 19154

J.C. Penney
1754 Franklin Mills Circle
Philadelphia, PA 19154

Writ of Summons

You are notified that the Plaintiff²

Usted esta avisado que el demandante

Douglas Davis

Has (have) commenced an action against you.
Ha (han) iniciado una accion en contra suya.



ERIC FEDER
Director, Office of Judicial Records

By:

Date:



¹ Name(s) of Defendant(s)

² Name(s) of Plaintiff(s)

Court of Common Pleas

_____ Term, 20 _____

No. _____

Douglas Davis

Plaintiff

vs.

Schindler Enterprises, Inc., Simon Property Group

Defendant

and J.C. Penney

SUMMONS

LUCAS AND CAVALIER, LLC

By: Keith E. Johnston, Esquire

Identification No.: 27692

1500 Walnut Street, Suite 1500

Philadelphia, PA 19102

tel (215) 751-9192

fax (215) 751-9277

kjohnston@lucascavalier.com

Attorney for defendants, Schindler Enterprises, Inc. and J.C. Penney



DOUGLAS DAVIS,

Plaintiff,

v.

**SCHINDLER ENTERPRISES, INC., SIMON
PROPERTY GROUP and J.C. PENNEY,**

Defendants.

**COURT OF COMMON PLEAS
PHILADELPHIA COUNTY, PA**

CIVIL ACTION

APRIL TERM, 2018

NO.: 02600

JURY TRIAL DEMANDED

PRAECIPE FOR ISSUANCE OF RULE TO FILE COMPLAINT

TO THE PROTHONOTARY:

Kindly enter a Rule upon plaintiff to file a complaint within twenty (20) days hereof or suffer the entry of a Judgment of Non Pros.

LUCAS AND CAVALIER, LLC

By:

**Keith E. Johnston, Esquire
1500 Walnut Street, Suite 1500
Philadelphia, PA 19102**

Tel (215) 751-9192

**Attorney for defendants Schindler
Enterprises, Inc. and J.C. Penney**

DOUGLAS DAVIS,

Plaintiff,

v.

**SCHINDLER ENTERPRISES, INC., SIMON
PROPERTY GROUP and J.C. PENNEY,**

Defendants.

**COURT OF COMMON PLEAS
PHILADELPHIA COUNTY, PA**

CIVIL ACTION

APRIL TERM, 2018

NO.: 02600

RULE TO FILE COMPLAINT

AND NOW, this _____ day of May, 2018, a Rule is hereby issued upon plaintiff to file a complaint within twenty (20) days hereof or suffer the entry of a Judgment of Non Pros.

Prothonotary



CERTIFICATE OF SERVICE

I, Keith E. Johnston, Esquire, certify a true and correct copy of the rule to file complaint was served this date via Electronic Filing upon the following parties or counsel of record:

Marc T. Sacchetta, Esquire
Sacchetta & Falcone
308 East Second Street
Media, PA 19063
Attorney for Plaintiff

Simon Property Group

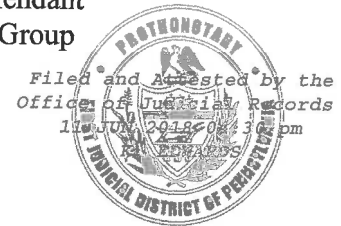


Keith E. Johnston, Esquire

Date: May 22, 2018

GEKOSKI & BOGDANOFF, P.C.
By: Michael S. Bogdanoff, Esquire
Attorney ID 73283
215 S. Broad Street
Suite 500
Philadelphia, PA 19107
215-563-2511

Attorney for Defendant
Simon Property Group



| | | |
|------------------------------------|---|-----------------------|
| DOUGLAS DAVIS | : | COURT OF COMMON PLEAS |
| | : | PHILADELPHIA COUNTY |
| Plaintiff | : | |
| v. | : | CIVIL ACTION |
| | : | |
| SCHINDLER ENTERPRISES, INC., et al | : | APRIL TERM, 2018 |
| | : | NO. 2600 |
| Defendants | : | |

ENTRY OF APPEARANCE

Kindly enter my appearance on behalf of Defendant Simon Property Group only in
the above-captioned matter.

GEKOSKI & BOGDANOFF, P.C.

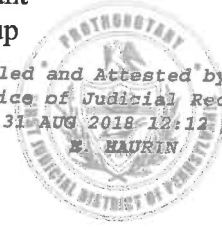
BY: /s/ Michael S. Bogdanoff
Michael S. Bogdanoff, Esquire
Attorney for Defendant
Simon Property Group
215 S. Broad Street
Suite 500
Philadelphia, PA 19107

Date: June 11, 2018

GEKOSKI & BOGDANOFF, P.C.
By: Michael S. Bogdanoff, Esquire
Attorney ID 73283
215 S. Broad Street
Suite 500
Philadelphia, PA 19107
215-563-2511

Attorney for Defendant
Simon Property Group

Filed and Attested by the
Office of Judicial Records
31 AUG 2018 12:12 pm
E. HAURIN



| | | |
|------------------------------------|---|-----------------------|
| DOUGLAS DAVIS | : | COURT OF COMMON PLEAS |
| | : | PHILADELPHIA COUNTY |
| Plaintiff | : | |
| v. | : | CIVIL ACTION |
| | : | |
| SCHINDLER ENTERPRISES, INC., et al | : | APRIL TERM, 2018 |
| | : | NO. 2600 |
| Defendants | : | |

WITHDRAWAL OF APPEARANCE

Kindly withdraw my appearance on behalf of Defendant Simon Property Group only
in the above-captioned matter.

GEKOSKI & BOGDANOFF, P.C.

BY: /s/ Michael S. Bogdanoff
Michael S. Bogdanoff, Esquire
Attorney for Defendant
Simon Property Group
215 S. Broad Street
Suite 500
Philadelphia, PA 19107

Date: August 31, 2018

David R. Bronstein, Esquire
bronstein@bbs-law.com
Identification No. 74908
BENNETT, BRICKLIN & SALTZBURG LLC
1601 Market Street, 16th Floor
Philadelphia, PA 19103
215-665-3342



| | | |
|--------------------------------------|---|------------------------|
| DOUGLAS DAVIS | : | |
| | : | |
| | : | COURT OF COMMON PLEAS |
| | : | COUNTY OF PHILADELPHIA |
| v. | : | |
| | : | |
| | : | APRIL TERM, 2018 |
| SCHINDLER ENTERPRISES, INC., | : | No. 2600 |
| SIMON PROPERTY GROUP AND J.C. PENNEY | : | |

ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Kindly enter my appearance as co-counsel for defendant, Simon Property Group, only, in the above-captioned matter. A jury of twelve (12) members is demanded.

BENNETT, BRICKLIN & SALTZBURG LLC

By: /s/ David R. Bronstein
David R. Bronstein, Esquire

LUCAS AND CAVALIER, LLC

By: Keith E. Johnston, Esquire

ID No.: 27692

1500 Walnut Street, Suite 1500

Philadelphia, PA 19102

T - (215) 751-9192

F - (215) 751-9277

kjohnston@lucascavalier.com

**Attorney for defendants, Schindler
Enterprises, Inc. and J.C. Penney**



DOUGLAS DAVIS,

Plaintiff,

v.

**SCHINDLER ENTERPRISES, INC., SIMON
PROPERTY GROUP and J.C. PENNEY,**

Defendants.

**IN THE COURT OF COMMON PLEAS OF
PHILADELPHIA COUNTY**

APRIL TERM, 2018

NO.: 02600

ENTRY OF APPEARANCE

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of defendants Schindler Elevator Corporation, incorrectly designated Schindler Enterprises, Inc., and J.C. Penney in the above captioned matter, on whose behalf a jury trial of twelve (12) plus two (2) alternatives is hereby demanded.

LUCAS AND CAVALIER, LLC

By: _____

Keith E. Johnston, Esquire

1500 Walnut Street, Suite 1500

Philadelphia, PA 19102

(215) 751-9192

**Attorney for Defendants, Schindler
Enterprises, Inc. and J.C. Penney**

CERTIFICATE OF SERVICE

I, Keith E. Johnston, Esquire, certify a true and correct copy the Entry of Appearance for defendants Schindler Enterprises, Inc. and J.C. Penney was served this date via ECF upon the following counsel of record:

Marc T. Sacchetta, Esquire
Sacchetta & Falcone
308 East Second Street
Media, PA 19063
Attorney for Plaintiff

Simon Property Group



Keith E. Johnston, Esquire

MARC T. SACCHETTA, ESQUIRE
 Attorney I.D. No. 84185
 SACCHETTA & FALCONE
 308 East Second Street
 Media, PA 19063
 (610) 891-2797 – Ph.
 (610) 891-8421 – Fx.

This is not an arbitration matter. Jury trial is demanded.



Attorney for Plaintiffs

DOUGLAS DAVIS

Plaintiff

COURT OF COMMON PLEAS
 PHILADELPHIA COUNTY, PA
 CIVIL ACTION – LAW

v.

SCHINDLER ENTERPRISES, INC.

and

SIMON PROPERTY GROUP

and

J.C. PENNEY

Defendants

APRIL TERM 2018
 NO. 2600

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas on las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una compareencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO,

PROVIDE YOU WITH INFORMATION ABOUT HIRING
A LAWYER. IF YOU CANNOT AFFORD TO HIRE A
LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU
WITH INFORMATION ABOUT AGENCIES THAT MAY
OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A
REDUCED FEE OR NO FEE.

Philadelphia County Bar Association
Lawyers Referral and Information Service
1 Reading Center
Philadelphia, PA 19107
[215] 238-1701

VAYA EN PERSONA O LLAME POR TELEFONO A LA
OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA
ABAJO PARA AVERIGUAR DONDE SE PUEDE CONS-
EGUIR ASISTENCIA LEGAL.

Asociacion De Licenciados De Filadelfia
Servicio De Referencia E Informacion Lega
One Reading Center
Filadelfia, Pennsylvania 19107
Telef.: [215] 238-1701

MARC T. SACCHETTA, ESQUIRE
 Attorney I.D. No. 84185
 SACCHETTA & FALCONE
 308 East Second Street
 Media, PA 19063
 (610) 891-2797 – Ph.
 (610) 891-8421 – Fx.

This is not an arbitration matter. Jury trial is demanded.

Attorney for Plaintiffs

DOUGLAS DAVIS

Plaintiff

COURT OF COMMON PLEAS
 PHILADELPHIA COUNTY, PA
 CIVIL ACTION – LAW

v.

SCHINDLER ENTERPRISES, INC.

and

SIMON PROPERTY GROUP

and

J.C. PENNEY

Defendants

APRIL TERM 2018
 NO. 2600

PLAINTIFF'S COMPLAINT

AND NOW, comes the plaintiff, Douglas Davis, by and through his attorney, Marc T.

Sacchetta, Esquire and respectfully represents as follows:

1. Plaintiff, Douglas Davis, is an adult individual residing at 1819 Green Leaf Street, Allentown, PA 18104.
2. Defendant, Schindler Enterprises, Inc., is, upon information and belief, a corporation, partnership, sole proprietorship, unincorporated association or other legal entity, regularly conducting business in Philadelphia County, with a registered office address at 20 Whippany Road Morristown, NJ 07960.
3. Defendant, Simon Property Group, is, upon information and belief, a corporation, partnership, sole proprietorship, unincorporated association or other legal entity, regularly conducting business in Philadelphia County, with a registered office address at 1455 Franklin Mills Circle, Philadelphia, PA 19154.

4. Defendant, J.C. Penney, is, upon information and belief, a corporation, partnership, sole proprietorship, unincorporated association or other legal entity, regularly conducting business in Philadelphia County, with a registered office address at 1754 Franklin Mills Circle, Philadelphia, PA 19154.

5. On or about April 24, 2016, Plaintiff was lawfully on defendants' premises, when he was injured as a result of a dangerous, defective condition (i.e., escalator).

6. At all times relevant hereto, defendants' owned and were in the exclusive possession, management and control of the property, which caused Plaintiff injuries.

7. At all times relevant hereto, defendants' were responsible for maintenance of the subject escalator, which caused Plaintiff's injuries.

COUNT I

Plaintiff, Douglas Davis v. Defendants, Schindler Enterprises, Inc., Simon Property Group and

J.C. Penney

8. Plaintiff, Douglas Davis incorporates by reference all preceding paragraphs of this Complaint as though fully set forth at length.

9. The incident and resulting injuries to plaintiff were caused by the negligence of defendants, acting by and through its agents, servants, workmen and employees.

10. Such negligence and carelessness consisted of the following:

- (a) defendants caused or permitted dangerous conditions to exist;
- (b) defendants failed to make a reasonable inspection of the premises, which would have revealed the dangerous condition created by the defendants;
- (c) defendants failed to give warning of the dangerous condition and failed to erect barricades or to take any other precautions to prevent injury to the plaintiff;

(d) defendants failed to remove the defective condition;

(e) defendants failed to exercise reasonable prudence and due care to keep the premises in a safe condition for the plaintiff;

(f) defendants failed to maintain the escalator;

(g) defendants failed to make adequate repairs to the escalator

11. Defendants, through its employees, servants and agents, either had actual notice of the unsafe and dangerous condition of the defect and sufficient time to correct the dangerous condition or that the condition existed for so long a period of time prior to the occurrence that defendant, in the exercise of due care, could and should have known of the unsafe and dangerous condition.

12. Solely as a result of the negligence of the defendants, plaintiff, Douglas Davis, was caused to suffer various physical injuries, including, but not limited to, left ankle injuries, left knee injuries, right knee injuries and right ankle injuries.

13. As a direct result of the aforesaid incident, plaintiff suffered severe shock to her nervous system, great physical pain and mental anguish, all of which may continue for an indefinite period of time in the future. Plaintiff has been compelled to expend various sums of money for medication and medical attention in attempting to remedy the aforementioned injuries.

14. As a direct result of the aforesaid incident, plaintiff has been prevented from attending to his usual duties and obligations, and believes that he may be prevented from doing so in the near future, as his injuries are permanent in nature.

15. The negligence and carelessness of defendants, Schindler Enterprises, Inc., Simon Property Group and J.C. Penney's has caused Plaintiff to suffer a loss of earnings and loss of earning capacity, and will continue to cause Plaintiff to suffer lost earnings for the remainder of his life.

WHEREFORE, plaintiff, Douglas Davis, demands judgment against defendants, jointly and

severally, in an amount in excess of Fifty Thousand (\$50,000.00) Dollars, and in an amount in excess of the amount requiring compulsory arbitration.

SACCHETTA & FALCONE

By: /s/ Marc T. Sacchetta, Esquire
MARC T. SACCHETTA, ESQUIRE
Attorney for Plaintiff

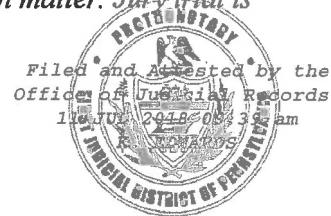
VERIFICATION

I hereby verify that the statements made in the foregoing document are true and correct to the best of my knowledge, information and belief. The undersigned understands that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904, relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to be 'X P. [unclear]', written over a horizontal line.

MARC T. SACCHETTA, ESQUIRE
 Attorney I.D. No. 84185
 SACCHETTA & FALCONE
 308 East Second Street
 Media, PA 19063
 (610) 891-2797 – Ph.
 (610) 891-8421 – Fx.

This is not an arbitration matter. Jury trial is demanded.



Attorney for Plaintiffs

DOUGLAS DAVIS

Plaintiff

COURT OF COMMON PLEAS
 PHILADELPHIA COUNTY, PA
 CIVIL ACTION – LAW

v.

SCHINDLER ENTERPRISES, INC.
 and
 SIMON PROPERTY GROUP
 and
 J.C. PENNEY

Defendants

APRIL TERM 2018
 NO. 2600

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas on las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una compareencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO IMMEDIATAMENTE. SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO,

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REDUCED FEE OR NO FEE.

Philadelphia County Bar Association
Lawyers Referral and Information Service
1 Reading Center
Philadelphia, PA 19107
[215] 238-1701

VAYA EN PERSONA O LLAME POR TELEFONO A LA
OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA
ABAJO PARA AVERIGUAR DONDE SE PUEDE CONS-
EGUIR ASISTENCIA LEGAL.

Asociacion De Licenciados De Filadelfia
Servicio De Referencia E Informacion Lega
One Reading Center
Filadelfia, Pennsylvania 19107
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MARC T. SACCHETTA, ESQUIRE
 Attorney I.D. No. 84185
 SACCHETTA & FALCONE
 308 East Second Street
 Media, PA 19063
 (610) 891-2797 – Ph.
 (610) 891-8421 – Fx.

This is not an arbitration matter. Jury trial is demanded.

Attorney for Plaintiffs

| | | |
|-----------------------------|---|-------------------------|
| DOUGLAS DAVIS | : | COURT OF COMMON PLEAS |
| Plaintiff | : | PHILADELPHIA COUNTY, PA |
| | : | CIVIL ACTION – LAW |
| v. | : | |
| | : | |
| SCHINDLER ENTERPRISES, INC. | : | |
| and | : | APRIL TERM 2018 |
| SIMON PROPERTY GROUP | : | NO. 2600 |
| and | : | |
| J.C. PENNEY | : | |
| Defendants | : | |

PLAINTIFF'S AMENDED COMPLAINT

AND NOW, comes the plaintiff, Douglas Davis, by and through his attorney, Marc T.

Sacchetta, Esquire and respectfully represents as follows:

1. Plaintiff, Douglas Davis, is an adult individual residing at 1819 Green Leaf Street, Allentown, PA 18104.
2. Defendant, Schindler Enterprises, Inc., is, upon information and belief, a corporation, partnership, sole proprietorship, unincorporated association or other legal entity, regularly conducting business in Philadelphia County, with a registered office address at 20 Whippany Road Morristown, NJ 07960.
3. Defendant, Simon Property Group, is, upon information and belief, a corporation, partnership, sole proprietorship, unincorporated association or other legal entity, regularly conducting business in Philadelphia County, with a registered office address at 1455 Franklin Mills Circle, Philadelphia, PA 19154.

4. Defendant, J.C. Penney, is, upon information and belief, a corporation, partnership, sole proprietorship, unincorporated association or other legal entity, regularly conducting business in Philadelphia County, with a registered office address at 1754 Franklin Mills Circle, Philadelphia, PA 19154.

5. On or about April 24, 2016, Plaintiff was lawfully on defendants, Simon Property Group and J.C. Penney's premises located at the Lehigh Valley Mall, 250 Lehigh Valley Mall, Whitehall, PA 18052, when he was injured as a result of an improperly maintained, dangerous, defective escalator.

6. At all times relevant hereto, defendants' owned and were in the exclusive possession, management and control of the property, which caused Plaintiff injuries.

7. At all times relevant hereto, defendants' were responsible for maintenance of the subject escalator, which caused Plaintiff's injuries.

COUNT I

Plaintiff, Douglas Davis v. Defendants, Schindler Enterprises, Inc., Simon Property Group and

J.C. Penney

8. Plaintiff, Douglas Davis incorporates by reference all preceding paragraphs of this Complaint as though fully set forth at length.

9. The incident and resulting injuries to plaintiff were caused by the negligence of defendants, acting by and through its agents, servants, workmen and employees.

10. Such negligence and carelessness consisted of the following:

- (a) defendants caused or permitted dangerous conditions to exist;
- (b) defendants failed to make a reasonable inspection of the premises, which would have revealed the dangerous condition created by the defendants;

(c) defendants failed to give warning of the dangerous condition and failed to erect barricades or to take any other precautions to prevent injury to the plaintiff;

(d) defendants failed to remove the defective condition;

(e) defendants failed to exercise reasonable prudence and due care to keep the premises in a safe condition for the plaintiff;

(f) defendants failed to maintain the escalator;

(g) defendants failed to make adequate repairs to the escalator

11. Defendants, through its employees, servants and agents, either had actual notice of the unsafe and dangerous condition of the defect and sufficient time to correct the dangerous condition or that the condition existed for so long a period of time prior to the occurrence that defendant, in the exercise of due care, could and should have known of the unsafe and dangerous condition.

12. Solely as a result of the negligence of the defendants, plaintiff, Douglas Davis, was caused to suffer various physical injuries, including, but not limited to, left ankle injuries, left knee injuries, right knee injuries and right ankle injuries.

13. As a direct result of the aforesaid incident, plaintiff suffered severe shock to her nervous system, great physical pain and mental anguish, all of which may continue for an indefinite period of time in the future. Plaintiff has been compelled to expend various sums of money for medication and medical attention in attempting to remedy the aforementioned injuries.

14. As a direct result of the aforesaid incident, plaintiff has been prevented from attending to his usual duties and obligations, and believes that he may be prevented from doing so in the near future, as his injuries are permanent in nature.

15. The negligence and carelessness of defendants, Schindler Enterprises, Inc., Simon Property Group and J.C. Penney's has caused Plaintiff to suffer a loss of earnings and loss of earning

capacity, and will continue to cause Plaintiff to suffer lost earnings for the remainder of his life.

WHEREFORE, plaintiff, Douglas Davis, demands judgment against defendants, jointly and severally, in an amount in excess of Fifty Thousand (\$50,000.00) Dollars, and in an amount in excess of the amount requiring compulsory arbitration.

SACCHETTA & FALCONE

By: /s/ Marc T. Sacchetta, Esquire
MARC T. SACCHETTA, ESQUIRE
Attorney for Plaintiff

VERIFICATION

I hereby verify that the statements made in the foregoing document are true and correct to the best of my knowledge, information and belief. The undersigned understands that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904, relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to be "X P. H.", written over a horizontal line.

MARC T. SACCHETTA, ESQUIRE
 Attorney I.D. No. 84185
 SACCHETTA & FALCONE
 308 East Second Street
 Media, PA 19063
 (610) 891-2797 – Ph.
 (610) 891-8421 – Fx.

This is not an arbitration matter. Jury demand.



Attorney for Plaintiffs

DOUGLAS DAVIS

Plaintiff

COURT OF COMMON PLEAS
 PHILADELPHIA COUNTY, PA
 CIVIL ACTION – LAW

v.

SCHINDLER ENTERPRISES, INC.
 and
 SIMON PROPERTY GROUP
 and
 J.C. PENNEY

Defendants

APRIL TERM 2018
 NO. 2600

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

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AVISO

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This is not an arbitration matter. Jury trial is demanded.

Attorney for Plaintiffs

DOUGLAS DAVIS
 Plaintiff

COURT OF COMMON PLEAS
 PHILADELPHIA COUNTY, PA
 CIVIL ACTION – LAW

v.

SCHINDLER ENTERPRISES, INC.

and

SIMON PROPERTY GROUP

and

J.C. PENNEY

Defendants

APRIL TERM 2018
 NO. 2600

PLAINTIFF'S SECOND AMENDED COMPLAINT

AND NOW, comes the plaintiff, Douglas Davis, by and through his attorney, Marc T.

Sacchetta, Esquire and respectfully represents as follows:

1. Plaintiff, Douglas Davis, is an adult individual residing at 1819 Green Leaf Street, Allentown, PA 18104.
2. Defendant, Schindler Enterprises, Inc., is, upon information and belief, a corporation, partnership, sole proprietorship, unincorporated association or other legal entity, regularly conducting business in Philadelphia County, with a registered office address at 20 Whippany Road Morristown, NJ 07960.
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4. Defendant, J.C. Penney, is, upon information and belief, a corporation, partnership, sole proprietorship, unincorporated association or other legal entity, regularly conducting business in Philadelphia County, with a registered office address at 1754 Franklin Mills Circle, Philadelphia, PA 19154.

5. On or about April 24, 2016, Plaintiff was lawfully on defendants, Simon Property Group and J.C. Penney's premises located at the Lehigh Valley Mall, 250 Lehigh Valley Mall, Whitehall, PA 18052, when he was injured as a result of an improperly maintained, dangerous, defective escalator, located in defendant, J.C. Penney's department store.

6. At all times relevant hereto, defendants' owned and were in the exclusive possession, management and control of the property, which caused Plaintiff injuries.

7. At all times relevant hereto, defendants' were responsible for maintenance of the subject escalator, which caused Plaintiff's injuries.

COUNT I

Plaintiff, Douglas Davis v. Defendants, Schindler Enterprises, Inc., Simon Property Group and

J.C. Penney

8. Plaintiff, Douglas Davis incorporates by reference all preceding paragraphs of this Complaint as though fully set forth at length.

9. The incident and resulting injuries to plaintiff were caused by the negligence of defendants, acting by and through its agents, servants, workmen and employees.

10. Such negligence and carelessness consisted of the following:

- (a) defendants caused or permitted dangerous conditions to exist;
- (b) defendants failed to make a reasonable inspection of the premises, which would have revealed the dangerous condition created by the defendants;

(c) defendants failed to give warning of the dangerous condition and failed to erect barricades or to take any other precautions to prevent injury to the plaintiff;

(d) defendants failed to remove the defective condition;

(e) defendants failed to exercise reasonable prudence and due care to keep the premises in a safe condition for the plaintiff;

(f) defendants failed to maintain the escalator;

(g) defendants failed to make adequate repairs to the escalator

11. Defendants, through its employees, servants and agents, either had actual notice of the unsafe and dangerous condition of the defect and sufficient time to correct the dangerous condition or that the condition existed for so long a period of time prior to the occurrence that defendant, in the exercise of due care, could and should have known of the unsafe and dangerous condition.

12. Solely as a result of the negligence of the defendants, plaintiff, Douglas Davis, was caused to suffer various physical injuries, including, but not limited to, left ankle injuries, left knee injuries, right knee injuries and right ankle injuries.

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14. As a direct result of the aforesaid incident, plaintiff has been prevented from attending to his usual duties and obligations, and believes that he may be prevented from doing so in the near future, as his injuries are permanent in nature.

15. The negligence and carelessness of defendants, Schindler Enterprises, Inc., Simon Property Group and J.C. Penney's has caused Plaintiff to suffer a loss of earnings and loss of earning

capacity, and will continue to cause Plaintiff to suffer lost earnings for the remainder of his life.

WHEREFORE, plaintiff, Douglas Davis, demands judgment against defendants, jointly and severally, in an amount in excess of Fifty Thousand (\$50,000.00) Dollars, and in an amount in excess of the amount requiring compulsory arbitration.

SACCHETTA & FALCONE

By: /s/ Marc T. Sacchetta, Esquire
MARC T. SACCHETTA, ESQUIRE
Attorney for Plaintiff

VERIFICATION

I hereby verify that the statements made in the foregoing document are true and correct to the best of my knowledge, information and belief. The undersigned understands that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904, relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to be 'X. J. [unclear]', written over a horizontal line.

110

IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
CIVIL TRIAL DIVISION

DOUGLAS DAVIS,

Plaintiff,

v.

SCHINDLER ENTERPRISES, INC., SIMON
PROPERTY GROUP and J.C. PENNEY,

Defendants.

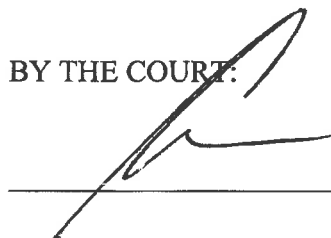
APRIL TERM, 2018

NO.: 02600

ORDER

AND NOW, this 23rd day of July, 2018, it is hereby **ORDERED** and **DECREED** that plaintiff shall serve full, complete and verified answers to defendants' interrogatories and request for production of documents within ^{Twenty (20)} ~~ten (10)~~ days of the date of this Order or appropriate sanctions may be imposed upon application to the court.

BY THE COURT:


J.



Case management conference: July 25, 2018

MOTION SUBMITTED

JUL 19

UNCONTESTED

DOCKETED

JUL 24 2018

L. PACE

EXHIBIT “B”

SACCHETTA & FALCONE
Attorneys At Law

308 East Second Street
Media, PA 19063
Voice 610 891 2797
Fax 610 891 8421

■ Marc T. Sacchetta
Licensed to practice in PA & NJ

August 22, 2018

■ Craig A. Falcone
Licensed to practice in PA & NJ

Via Email to kjohnston@lucascavalier.com

Keith E. Johnston, Esquire
Lucas and Cavalier, LLC
1500 Walnut Street, Suite 1500
Philadelphia, PA 19102

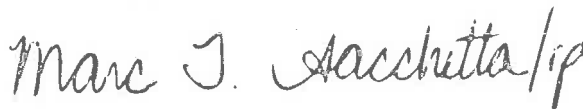
Re: Douglas Davis vs. Schindler Enterprises, Inc., et al.
Phila.Co.C.C.P. April Term, 2018; No.: 02600

Dear Mr. Johnston:

Enclosed please find Plaintiff's discovery responses concerning the above-captioned matter. Unless I hear to the contrary, I assume you will not be presenting your motion scheduled for August 27, 2018.

Thank you.

Very truly yours,



MARC T. SACCHETTA, ESQUIRE

MTS/rp
Enclosures

Office Locations:

Philadelphia, PA • Media, PA • Plymouth Meeting, PA • Allentown, PA • Marlton, NJ

MARC T. SACCHETTA, ESQUIRE
Attorney I.D. No. 84185
SACCHETTA & FALCONE
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Media, PA 19063
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Attorney for Plaintiff

DOUGLAS DAVIS

Plaintiff

v.

SCHINDLER ENTERPRISES, INC.
and
SIMON PROPERTY GROUP
and
J.C. PENNEY

Defendants

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY, PA
CIVIL ACTION - LAW

APRIL TERM 2018
NO. 2600

PLAINTIFF'S ANSWERS TO DEFENDANT'S INTERROGATORIES

1. Kim Davis (manager at JC Penney).
2. My brand new Nike sneakers damages as well as my knee damage.
3. See attached medical records.
4. See attached medical records.
5. See attached medical records.
6. Not sure.
7. No.
8. Six weeks.
9. Scar on my knee. When I walk, my knee pops sometimes.
10. No.
11. No.
12. No.
13. See attached medical records.

14. Scar on my knee. When I walk, my knee pops sometimes.
15. Medicare, Blue Cross, Harrisburg, PA 17172
16. Yes. Amount unknown.
17. I receive Medicare benefits.
18. To be supplied.
19.
 - (a) 53.
 - (b) 7/8/64
 - (c) South Carolina
 - (d) 210-56-7044
 - (e) No.
 - (f) Kim Galbraith, Donna Semmel 87
Lehigh County Courthouse
 - (g) N/A.
 - (h) 1819 Greenleaf, Allentown, PA 18104
 - (i) N/A
 - (j) Douglas Glenn Davis.
20. William Allen High School, 17th Linden, Allentown, PA
21. Matt Walton
1431 Nursery St., Ste 101A, Fogelsville, PA 18051-1612
22. No.
23. No.
24. Experts unknown at this time.
25. Experts unknown at this time.
26. Experts unknown at this time.

27. Experts unknown at this time.
28. Experts unknown at this time.
29. Experts unknown at this time.
30. Experts unknown at this time.
31. Experts unknown at this time.
32. Experts unknown at this time.
33. Experts unknown at this time. Discovery is ongoing.
34. Experts unknown at this time. Discovery is ongoing.
35. Experts unknown at this time. Discovery is ongoing.
36. N/A.
37. N/A.
38. Kim Davis (manager at JC Penney). Day of incident.
39. N/A.
40. Yes.
41. I do not recall.
42. No.
43. N/A.
44. No.
45. N/A.
46. No.
47. N/A.
48. I walked down escalator. I was about to get off the escalator when it grabbed the back of my sneaker. Would not let go. I had to pull my leg out from escalator.

49. Unknown at this time.
50. Unknown at this time.
51. Not sure.
52. N/A.
53. No.
54. N/A.
55. No.
56. No.
57. Shopping with my wife.
58. Took B.P., insulin medications in the morning. My wife.
59. No.
60. It is the escalator going down. No construction that I recall. No barricades, warning signs or materials that I recall.
61. No.
62. Primary medicare ID #: To be supplied.
Secondary BC ID#: YWM80154130000
63. No.
64. Yes. Dialysis. 4/13 Dr. Dratch (I think).
65. Yes. Local 1174 Labors.
S.S.D. kidney failure (Dr. Dratch).
66. No.
67. Past and future medical bills.
68. I injured my knee.
69. Yes, Facebook but I no longer use it.

70. Douglas Davis
1219 Green Leaf Street
Allentown, PA 18104

SACCHETTA & FALCONE

By:



MARC T. SACCHETTA, ESQUIRE
Attorney for Plaintiff

VERIFICATION

I hereby verify that the statements made in the foregoing document are true and correct to the best of my knowledge, information and belief. The undersigned understands that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904, relating to unsworn falsification to authorities.

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/s/ Marc T. Sacchetta
MARC T. SACCHETTA, ESQUIRE

David B. Pizzica

From: Sean L. Phelan
Sent: Thursday, September 13, 2018 11:06 AM
To: David B. Pizzica
Subject: FW: Oregon Powder; 8700-8725

Dave,

Pls see below. Pls let me know if you have any questions. Tom has the printed out cases, thx.

From: Sean L. Phelan
Sent: Wednesday, September 12, 2018 1:23 PM
To: Thomas S. Coleman <tc Coleman@lucascavalier.com>
Subject: Oregon Powder; 8700-8725

Hi Tom,

You had asked me to look into whether Hallmark is required to provide additional insured coverage to Georgia Pacific and whether subrogation rights were waived, pursuant to the insured's contractual obligations with Georgia Pacific. As you stated and pursuant to my brief review of the background facts of the case, the insured's contract with Georgia Pacific required Oregon Powder Coating to purchase CGL, auto and worker's comp. coverage, as well as name Georgia Pacific as an additional insured on said policies. The contract also generally states that "[Oregon Powder Coating] shall waive all rights of subrogation that the[se] insurers may have against [Georgia Pacific]."

However, the contract did not specifically require the insured to purchase commercial property insurance (which policy is what's actually covering the subject loss), nor name Georgia Pacific as an additional insured on said policy. Furthermore, since the subrogation waiver appears to relate only to the CGL, auto and worker's comp. insurers specifically referenced in the contract between OPC and Georgia Pacific, not the commercial property insurer, said waiver presumably would not apply given the waiver expressly refers to only the CGL, auto or worker's comp "insurers", not the commercial property insurer.

Insurance Procurement Agreements

As you know, at least in PA, where one party has agreed to obtain liability insurance coverage on behalf of another party, but fails to do so, it is liable to the other party as if it were the other party's insurer. Namely, a party which has breached an agreement to procure insurance coverage is liable for the amount which would have been recoverable had the insurance coverage in question been obtained. *Laventhal & Horwath v. Dependable Insurance Associates*, 396 Pa. Super. 553, 579 A.2d 388 (1990). Unlike a situation with respect to claims based upon written indemnification agreements, which are typically covered by a CGL policy, an insured's alleged breach of an agreement to procure insurance coverage on another party's behalf is not covered by such a liability policy, courts generally reasoning that such breach of contract claims do not involve "damages" for "bodily injury" or "property damage" caused by an "occurrence" within the scope of the CGL policy insuring agreement. *See, e.g., Giancritoforo v. Mission Gas & Oil Products*, 776 F. Supp. 1037 (E.D. Pa. 1991); *Aetna v. Spancrete of Illinois*, 726 F. Supp. 204 (N.D. Ill. 1989); *Office Structures v. Home Ins. Co.*, 503 A.2d 193 (Del. 1985).

As you know, additional insured status is accomplished through endorsements conferring insured status upon designated entities either by name, or general description (e.g., owners, lessees or contractors) or on a "blanket" basis using language which broadly applies to any person or entity for which the policyholder has agreed to procure coverage under a contract or agreement. As such, we will obviously want to review what the endorsement to the insured's commercial property insurance policy says, and whether it can be construed to have identified Georgia Pacific either expressly or implicitly (keeping in mind said endorsements are typically construed broadly against the insurer to

the extent they are ambiguous in the context of whether a party was required to be named an additional insured). Regardless of the insurer's subjective intentions, those of its policyholder, or those of the party seeking insured status, it is the intent which is expressed by the language of the insurance contract itself which controls under general principles of insurance policy construction. *See, e.g., Standard Venetian Blind v. American Empire Ins. Co.*, 503 Pa. 300, 469 A.2d 563 (1983). Moreover, the underlying contract language (i.e., between OPC and Georgia Pacific) is not controlling as to the insurer's obligations, since the insurer was not a party to that contract. *See, Transport Indemnity Co. v. Home Indemnity Co.*, 535 F.2d 232 (3d Cir. 1976)

I have printed out the case of *Best Friends Pet Care, Inc. v. Design Learned, Inc.*, 77 Conn. App. 167 (App. Ct. of CT), which dealt with a court's upholding of a waiver of subrogation clause under similar facts, but which can be distinguished under the facts of our case in that our insured was not required to purchase property insurance for the work being performed by Georgia Pacific onsite and given the subro waiver in our case appears to have been designed to unilaterally relieve GP from the effects of its future negligence.

I have also printed the case of *Stranz v. N.Y.SERDA*, 87 A.D.3d. 1279 (App.Div., 4th Dept., NY), which arguably supports our position that the contractual waiver of subrogation does not preclude Hallmark from seeking subrogation against Georgia Pacific, given our contract (like the contract in *Stranz*), only required OPC to have its auto, CGL and comp insurers waive their subro rights, not the commercial prop. insurer. The case of *St. John's Univ. v. Butler Rogers Baskett Architects, P.C.*, 92 A.D.3d 761 (2012 N.Y. Slip. Op. 01238), can also potentially be used in support of both our arguments that GP is not an additional insured under the property policy and, thus, that there is no waiver of subrogation .

Conclusion

Based on the above, obviously the language contained in the commercial property insurance policy and endorsement will be key to determining whether they could be construed to confer additional insured status to Georgia Pacific. As will the determination of which state's law will apply to determine the foregoing issues. Our best argument will certainly be the fact that the plain language of the contract itself did not require our insured to name Georgia Pacific as an additional insured on the commercial property insurance policy (therefore, GP is not an additional insured on said policy), and the subro waiver also does not apply pursuant to the plain language of the contract, given the commercial property insurer was not countenanced by the contract in this regard. Also we should, of course, rely on our strong equity argument that Georgia Pacific is the party actually responsible for this loss (as subrogation, across jurisdictions, "allocates responsibility for an insured loss to the person who in equity and good conscience ought to pay it, in the interest of avoiding absolution of a wrongdoer from liability simply because the insured had the foresight to procure insurance coverage"). *See, e.g., St. John's Univ., supra.*

Obviously, as with the memo I prepared yesterday, you are already aware of probably most, if not all of the above law/rules of construction, but I include same in the hopes it will be helpful should you need to quickly go over with the client, include in a tender response, etc.

Thank you and please advise if I can be of any additional assistance.



Sean L. Phelan, Esq.

Associate | Lucas and Cavalier, LLC

PA Office – 1500 Walnut Street, Suite 1500, Philadelphia, PA 19102

NJ Office – 126 White Horse Pike, Third Floor, Haddon Heights, NJ 08035

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[Website](#) [Email](#) [Bio](#)

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SACCHETTA & FALCONE
Attorneys At Law

308 East Second Street
Media, PA 19063
Voice 610 891 2797
Fax 610 891 8421

■ Marc T. Sacchetta
Licensed to practice in PA & NJ

August 24, 2018

■ Craig A. Falcone
Licensed to practice in PA & NJ

Via Email to kjohnston@lucascavalier.com

Keith E. Johnston, Esquire
Lucas and Cavalier, LLC
1500 Walnut Street, Suite 1500
Philadelphia, PA 19102

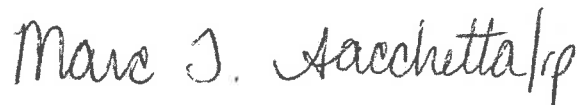
Re: Douglas Davis vs. Schindler Enterprises, Inc., et al.
Phila.Co.C.C.P. April Term, 2018; No.: 02600

Dear Mr. Johnston:

This shall confirm receipt of your email of August 23, 2018 regarding Plaintiff's discovery responses. I have enclosed Plaintiff's Amended Answers to Defendant's Interrogatories with more specific information, as per your request. With regard to any Medicare lien, please be advised that my office has requested that information from Medicare and we are currently awaiting same. We will supplement Plaintiff's discovery responses upon receipt of this information. The documents requested in paragraph 5 have been provided in Plaintiff's Response to Request for Production of Documents. Specifically, these documents consist of the three 7/13/16 x-rays from St. Luke's Radiology. Be advised there are no documents in my possession pertaining to paragraphs 20 and 22.

Please confirm that you will not be presenting your motion Monday, August 27, 2018.
Thank you.

Very truly yours,



MARC T. SACCHETTA, ESQUIRE

MTS/rp
Enclosures

Office Locations:

Philadelphia, PA • Media, PA • Plymouth Meeting, PA • Allentown, PA • Marlton, NJ

MARC T. SACCHETTA, ESQUIRE
Attorney I.D. No. 84185
SACCHETTA & FALCONE
308 East Second Street
Media, PA 19063
(610) 891-2797 - Ph.
(610) 891-8421 - Fx.

Attorney for Plaintiff

DOUGLAS DAVIS

Plaintiff

v.

SCHINDLER ENTERPRISES, INC.

and

SIMON PROPERTY GROUP

and

J.C. PENNEY

Defendants

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY, PA
CIVIL ACTION - LAW

APRIL TERM 2018
NO. 2600

PLAINTIFF'S AMENDED ANSWERS TO DEFENDANT'S INTERROGATORIES

1. Kim Davis (manager at JC Penney).
2. My brand new Nike sneakers damages as well as my knee damage.
3. See attached medical records.
4. See attached medical records.
5. See attached medical records.
6. 07/28/17 at St. Luke's Orthopedics
7. No.
8. Six weeks.
9. Scar on my knee. When I walk, my knee pops sometimes.
10. No.
11. No.
12. No.

13. See attached medical records.
14. Scar on my knee. When I walk, my knee pops sometimes.
15.
 - (a) Medicare, address unknown
Blue Cross, address unknown
 - (b) Medical coverage through both
 - (c) Medicare ID#: 210567044A at the time of the occurrence and treatment.
ID# was later changed to 9A89-T99-CW24.
Blue Cross ID#: YWM80154130000
16. Yes. Amount unknown.
17. I receive Medicare benefits.
18.
 - (a) Medicare ID#: 210567044A at the time of the occurrence and treatment.
ID# was later changed to 9A89-T99-CW24.
 - (b) MSPRC NGHP
P.O. Box 138832
Oklahoma City, OK 73113
 - (c) Please forward an authorization for Plaintiff's signature.
19.
 - (a) 53.
 - (b) 7/8/64
 - (c) South Carolina
 - (d) 210-56-7044
 - (e) No.
 - (f) Kim Galbraith, Donna Semmel 87
Lehigh County Courthouse
 - (g) N/A.
 - (h) 1819 Greenleaf, Allentown, PA 18104
 - (i) N/A
 - (j) Douglas Glenn Davis.

20. William Allen High School, 17th Linden, Allentown, PA
21. Matt Walton
1431 Nursery St., Ste 101A, Fogelsville, PA 18051-1612
22. No.
23. No.
24. Experts unknown at this time.
25. Experts unknown at this time.
26. Experts unknown at this time.
27. Experts unknown at this time.
28. Experts unknown at this time.
29. Experts unknown at this time.
30. Experts unknown at this time.
31. Experts unknown at this time.
32. Experts unknown at this time.
33. Unknown at this time. Discovery is ongoing.
34. Unknown at this time. Discovery is ongoing.
35. Unknown at this time. Discovery is ongoing.
36. N/A.
37. N/A.
38. Kim Davis (manager at JC Penney). Day of incident.
39. N/A.
40. Yes.
41. I do not recall.

42. No.
43. N/A.
44. No.
45. N/A.
46. No.
47. N/A.
48. I walked down escalator. I was about to get off the escalator when it grabbed the back of my sneaker. Would not let go. I had to pull my leg out from escalator.
49. Unknown at this time.
50. Unknown at this time.
51. Not sure.
52. N/A.
53. No.
54. N/A.
55. No.
56. No.
57. Shopping with my wife.
58. Took B.P., insulin medications in the morning. My wife.
59. No.
60. It is the escalator going down. No construction that I recall. No barricades, warning signs or materials that I recall.
61. No.
62. Primary: Medicare ID#: 210567044A at the time of the occurrence and treatment. ID# was later changed to 9A89-T99-CW24.
Secondary: Blue Cross ID#: YWM80154130000

- 63. No.
- 64. Yes. Dialysis. 4/13 Dr. Dratch (I think).
- 65. Yes. Local 1174 Labors.
S.S.D. kidney failure (Dr. Dratch).
- 66. No.
- 67. Past and future medical bills.
- 68. I injured my knee.
- 69. Yes, Facebook but I no longer use it.
- 70. Douglas Davis
1219 Green Leaf Street
Allentown, PA 18104

SACCHETTA & FALCONE

By: Marc T. Sacchetta /rp
MARC T. SACCHETTA, ESQUIRE
Attorney for Plaintiff

VERIFICATION

I hereby verify that the statements made in the foregoing document are true and correct to the best of my knowledge, information and belief. The undersigned understands that false statements herein are made subject to the penalties of 18 Pa.C.S. §4904, relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to be "X. D. [unclear]", written over a horizontal line.

MEDICAL RECORDS**Client Name: Douglas Davis****Date of Incident: 04/24/2016****File No.: 16-6980**

| <u>PROVIDER</u> | <u>DOS</u> | <u>RECORDS</u> |
|----------------------------|-------------------|---|
| 1. St. Luke's Hospital | 6/24/2016 | Emergency Departmen Records |
| 2. St. Luke's Radiology | 7/13/2016 | X-Ray - LT Ankle |
| | 7/13/2016 | X-Ray - LT Knee |
| | 7/13/2016 | X-Ray - RT Knee |
| | 7/24/2016 | MRI - LT Knee |
| 3. St. Luke's Orthopaedics | 7/13/2016 | Initial Evaluation |
| | 8/3/2016 | Follow Up |
| | 8/31/2016 | Follow Up |
| | 12/28/2016 | Follow Up |
| | 1/23/2017 | <u>Operative Report - LT Knee Arthroscopy</u> |
| | 1/27/2017 | Post-Op Follow Up |
| 4. Lehigh Valley Pain Ctr | 5/2/2016 | New Patient Exam |
| | 5/4/2016 | Office Visit |
| | 5/18/2016 | Office Visit |

Douglas Davis
Medical Records
File No.: 16-6980

#1
St. Luke's Hospital



DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M

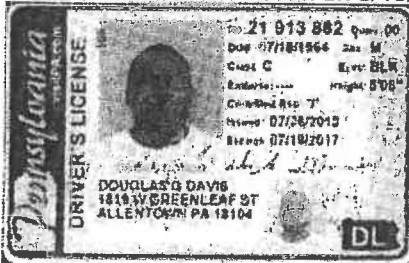
Patient Demographics

| | | | | |
|---|------------------|--------------------|------------------|-------------------|
| Name | Patient ID | SSN | Sex | Birth Date |
| Davis, Douglas G | 1769210068 | xxx-xx-7044 | Male | 07/18/64 (52 yrs) |
| Address | Phone | Email | Employer | |
| 1819 GREENLEAF ST ALLENTOWN PA 18104 | 610-437-3821 (H) | | | |
| Reg Status | PCP | Date Last Verified | Next Review Date | |
| Verified | | 08/08/16 | 09/07/16 | |

Patient-Level Documents:

Outpatient General Consent - Electronic signature on 7/13/2016 3:04 PM

Patient Identification - Scan on 6/10/2016 7:00 AM (below)



Notice of Privacy Practice Acknowledgement - Scan on 1/13/2016 7:11 AM : 10 (below)

St Luke's
UNIVERSITY HEALTH NETWORK
801 Ostrum Street
Bethlehem, PA 18015

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M

Patient-Level Documents: (continued)

St Luke's
UNIVERSITY HEALTH NETWORK

**ST. LUKE'S UNIVERSITY HEALTH NETWORK AND ITS AFFILIATES
NOTICE OF PRIVACY PRACTICES ACKNOWLEDGMENT**

Print Patient Name Douglas G Davis Account Number _____
Date of Birth _____ Medical Record Number _____

☐ I have received a copy of St. Luke's University Health Network's Notice of Privacy Practices.


☐ Patient refused to sign the St. Luke's University Health Network's Notice of Privacy Practices.

☐ Patient signed St. Luke's University Health Network's Notice of Privacy Practices but unable to sign. 2
Reason _____

☐ Notice given to patient representative.
Name _____ Relationship _____

☐ St. Luke's University Health Network's Notice of Privacy Practices sent to patient
on _____ Sent by _____
(Date) (Name and Dept.)

Patient's Signature Date _____ Time _____

 15323NM

15323NM Rev 07/13

Admission Information - Patient Record Only

| | | | | | |
|--------------------|-----------------|------------------|---------------------------------------|--------------------|-------|
| Arrival Date/Time: | 06/24/2016 0608 | Admit Date/Time: | 06/24/2016 0612 | IP Adm. Date/Time: | |
| Admission Type: | Emergency | Point of Origin: | Home/work/non-health Care Facility | Admit Category: | |
| Means of Arrival: | Walk-in | Primary Service: | Emergency Medicine | Secondary Service: | N/A |
| Transfer Source: | | Service Area: | St Luke's Univ Service Area | Unit: | Al Ed |



AL St. Luke's Hospital - Allentown
Campus

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 11100117593
Adm: 6/24/2016, D/C: 6/24/2016

Admission Information - Patient Record Only (continued)

Admit Provider: Richard Tabor, MD Attending Provider: Richard Tabor, MD Referring Provider:

Discharge Information - Patient Record Only

Discharge Date/Time: 06/24/2016 0638 Discharge Disposition: Home/self Care Discharge Destination: Home Discharge Provider: None Unit: Al Ed

Final Diagnoses (ICD-10-CM)

| Code | Description | POA | CC | HAC | Affects DRG |
|---------------------|--|-----|----|-----|-------------|
| M23.92, [Principal] | Unspecified internal derangement of left knee | | | | |
| E11.9 | Type 2 diabetes mellitus without complications | | | | |
| I10 | Essential (primary) hypertension | | | | |

Events

| Date/Time | Event | Pt Class | Unit | Room/Bed | Service |
|---------------|------------|----------|-------|----------|---------|
| 06/24/16 0808 | ED Arrival | | AL ED | | |
| 06/24/16 0612 | ED Roomed | | AL ED | | |
| 06/24/16 0638 | Discharge | | AL ED | | |

Allergies as of 6/24/2016

No Known Allergies

Reviewed On: 6/24/2016 By: Richard Tabor, MD

Medical

as of 6/24/2016

Past Medical History

Diabetes mellitus
Hypertension

Date

Comments

Source

Provider
Provider

Surgical

as of 6/24/2016

Problem List

None

Reviewed: 6/24/2016 6:24 AM by Richard Tabor, MD

ED Arrival Information

| Expected | Arrival | Acuity | Means of Arrival | Escorted By | Service | Admission Type |
|--------------------------------|-----------------|-------------|------------------|-------------|--------------------|----------------|
| | 6/24/2016 06:08 | Less Urgent | Walk-In | Self | Emergency Medicine | Emergency |
| Arrival Complaint KNEE PAIN | | | | | | |

Chief Complaint

Knee Pain [140012]

Pt c/o left knee pain. Pt states, "it feels like a pop when I go up the stairs". Pt denies any injury to leg.

Diagnosis

Internal derangement of left knee

ED Disposition

| ED Disposition | Condition | Comment |
|----------------|-----------|--|
| Discharge | | Douglas G Davis discharge to home/self care. |
| | | Condition at discharge: Good |



AL St. Luke's Hospital - Allentown
Campus

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct#: 11100117593
Adm: 6/24/2016, D/C: 6/24/2016

ED Notes

ED Notes by Courtney Pascarella, RN at 6/24/2016 6:24 AM

Author: Courtney Pascarella, RN

Service: Critical Care/ICU

Author Type: Registered Nurse

Filed: 6/24/2016 6:25 AM

Date of Service: 6/24/2016 6:24 AM

Status: Signed

Editor: Courtney Pascarella, RN (Registered Nurse)

States previous x-ray for same c/o left knee pain, was diagnosed with arthritis

Courtney Pascarella, RN
06/24/16 0625

Electronically Signed by Courtney Pascarella, RN on 6/24/2016 6:25 AM

ED Notes by Courtney Pascarella, RN at 6/24/2016 6:25 AM

Author: Courtney Pascarella, RN

Service: Critical

Author Type: Registered Nurse

Filed: 6/24/2016 6:25 AM

Date of Service: 6/24/2016 6:25 AM

Status: Signed

Editor: Courtney Pascarella, RN (Registered Nurse)

Provider at bedside.

Courtney Pascarella, RN
06/24/16 0625

Electronically Signed by Courtney Pascarella, RN on 6/24/2016 6:25 AM

ED Provider Notes by Richard Tabor, MD at 6/24/2016 6:30 AM

Author: Richard Tabor, MD

Service: (none)

Author Type: Physician

Filed: 6/25/2016 6:56 PM

Date of Service: 6/24/2016 6:30 AM

Status: Signed

Editor: Richard Tabor, MD (Physician)

History

Chief Complaint

Patient presents with

- Knee Pain

Pt c/o left knee pain. Pt states, "it feels like a pop when I go up the stairs". Pt denies any injury to leg.

HPI Comments: Patient is a 51-year-old male presents to the emergency room for evaluation of left knee pain. He reports that back in April, patient got stuck on an escalator, and he's been complaining of knee pain ever since. He didn't have x-rays at that time. They were negative. Since then he's been complaining of pain to the lateral aspect of the left knee. Especially when he does stairs. He feels popping and clicking. There is no associated fever or motor/sensory complaints. He has a history of diabetes and end-stage renal disease. He has hypertension.

Patient is a 51 y.o. male presenting with knee pain.

Knee Pain

Associated symptoms: no fever

There are no discharge medications for this patient.



AL St. Luke's Hospital - Allentown
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Adm: 6/24/2016, D/C: 6/24/2016

ED Notes (continued)

ED Provider Notes by Richard Tabor, MD at 6/24/2016 6:30 AM (continued)

Past Medical History

- Diagnosis
- Diabetes mellitus
 - Hypertension

Date

History reviewed. No pertinent past surgical history.

History reviewed. No pertinent family history.

I have reviewed and agree with the history as documented.

Social History

Substance Use Topics

- Smoking status: Never Smoker
- Smokeless tobacco: None
- Alcohol use: Yes

Comment: occasional

Review of Systems

Constitutional: Negative for chills and fever.

Neurological: Negative for weakness and numbness.

All other systems reviewed and are negative.

Physical Exam

| ED Triage Vitals | | | | |
|-------------------|-------------------|------------------|------------------|------------------|
| Temperature | Pulse | Respirations | Blood Pressure | SpO2 |
| 06/24/16 0618 | 06/24/16 0618 | 06/24/16 0618 | 06/24/16 0618 | 06/24/16 0618 |
| 97.9 °F (36.6 °C) | 60 | 18 | 184/93 | 98 % |
| Temp src | Heart Rate Source | Patlent Position | BP Location | FIO2 (%) |
| -- | 06/24/16 0618 | 06/24/16 0618 | 06/24/16 0618 | -- |
| | Monitor | Sitting | Left arm | |



AL St. Luke's Hospital - Allentown
Campus

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Acct #: 11100117593
Adm: 6/24/2016, D/C: 6/24/2016

ED Notes (continued)

ED Provider Notes by Richard Tabor, MD at 6/24/2016 6:30 AM (continued)

| | | | | |
|------------------|--|--|--|--|
| Pain Score | | | | |
| 06/24/16 0618 | | | | |
| 4 | | | | |

Physical Exam

Constitutional: He is oriented to person, place, and time. He appears well-developed and well-nourished.

HENT:

Head: Normocephalic and atraumatic.

Neck: Normal range of motion. Neck supple.

Pulmonary/Chest: Effort normal. No respiratory distress.

Musculoskeletal: Normal range of motion. He exhibits no edema, tenderness or deformity.

There is no point tenderness. No effusion. There is no instability with stress testing. Good distal pulse. Normal motor sensory exam. Patient able to ambulate. There is no tenderness to the patellar or fibular head.

Neurological: He is alert and oriented to person, place, and time.

Skin: Skin is warm.

Psychiatric: He has a normal mood and affect. His behavior is normal.

Vitals reviewed.

ED Medications

Medications - No data to display

Diagnostic Studies

Labs Reviewed - No data to display

No orders to display

Procedures

Procedures

Phone Contacts

ED Phone Contact

ED Course

ED Course

There is no data filed.



AL St. Luke's Hospital - Allentown
Campus

DAVIS, DOUGLAS G
MRN: 1769210068
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Acct#: 11100117593
Adm: 6/24/2016, D/C: 6/24/2016

ED Notes (continued)

ED Provider Notes by Richard Tabor, MD at 6/24/2016 6:30 AM (continued)

MDM

Number of Diagnoses or Management Options

Diagnosis management comments: X-rays not indicated by Ottawa knee rules. This is most likely a soft tissue injury. Probably meniscal injury. A ligamentous injury is also in the differential.

CritCare Time

Disposition

Final diagnoses:
Internal derangement of left knee

ED Disposition

| ED Disposition | Condition | Comments |
|----------------|------------------------------|--|
| Discharge | | Douglas G Davis discharge to home/self care. |
| | Condition at discharge: Good | |

Follow-up Information

| Follow up With | Details | Comments | Contact Info |
|--------------------|-----------|----------|--|
| Daniel Heckman, MD | In 1 week | | 501 Catronia Road Suite 125 Allentown PA 18104 484-526-1735 |

There are no discharge medications for this patient.

No discharge procedures on file.

ED Provider

Electronically Signed by

Richard Tabor, MD
06/25/16 1856

Electronically Signed by Richard Tabor, MD on 6/25/2016 6:56 PM

Physician Notes

No notes of this type exist for this encounter.



AL St. Luke's Hospital - Allentown
Campus

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 11100117593
Adm: 6/24/2016, D/C: 6/24/2016

ED Notes - Nursing Notes

ED Notes by Courtney Pascarella, RN at 6/24/2016 6:24 AM

Author: Courtney Pascarella, RN

Service: Critical Care/ICU

Author Type: Registered Nurse

Filed: 6/24/2016 6:25 AM

Date of Service: 6/24/2016 6:24 AM

Status: Signed

Editor: Courtney Pascarella, RN (Registered Nurse)

States previous x-ray for same c/o left knee pain, was diagnosed with arthritis

Courtney Pascarella, RN
06/24/16 0625

Electronically Signed by Courtney Pascarella, RN on 6/24/2016 6:25 AM

ED Notes by Courtney Pascarella, RN at 6/24/2016 6:25 AM

Author: Courtney Pascarella, RN

Service: Critical Care/ICU

Author Type: Registered Nurse

Filed: 6/24/2016 6:25 AM

Date of Service: 6/24/2016 6:25 AM

Status: Signed

Editor: Courtney Pascarella, RN (Registered Nurse)

Provider at bedside.

Courtney Pascarella, RN
06/24/16 0625

Electronically Signed by Courtney Pascarella, RN on 6/24/2016 6:25 AM



AL St. Luke's Hospital - Allentown
Campus

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 11100117593
Adm: 6/24/2016, D/C: 6/24/2016

All Orders

meloxicam (MOBIC) 15 mg tablet [27563767]

Electronically signed by: Richard Tabor, MD on 06/24/16 0635

Ordering user: Richard Tabor, MD 06/24/16 0635

Authorized by: Richard Tabor, MD

Frequency: Daily PRN 06/24/16 - Until Discontinued

Ordering provider: Richard Tabor, MD

PRN Comment: pain

Status: Active

All Results

No results found



AL St. Luke's Hospital - Allentown
Campus

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 11100117593
Adm: 6/24/2016, D/C: 6/24/2016

Medications

All Meds and Administrations

(There are no med orders for this encounter)

Education

No education to display

Discharge Instructions

Davis, Douglas G (MR # 1769210068)

| Date | Status | User | User Type | Discharge Note |
|---------------|--------|-------------------|-----------|----------------|
| 06/24/16 0834 | Pended | Richard Tabor, MD | Physician | Original |
| Note: | | | | |

Knee Pain

WHAT YOU SHOULD KNOW:

Knee pain may start suddenly, or it may be a long-term problem. You may have pain on the side, front, or back of your knee. You may have knee stiffness and swelling. You may hear popping sounds or feel like your knee is giving way or locking up as you walk. You may feel pain when you sit, stand, walk, or climb up and down stairs. Knee pain can be caused by conditions such as obesity, inflammation, or strains or tears in ligaments or tendons.

INSTRUCTIONS:

Follow up with your primary healthcare provider within 24 hours or as directed: You may need follow-up treatments, such as steroid injections to decrease pain. Write down your questions so you remember to ask them during your visits.

Self-care:

- **Rest** your knee so it can heal. Limit activities that increase your pain.
- **Ice** can help reduce swelling. Wrap ice in a towel and put it on your knee for as long and as often as directed.
- **Compression** with a brace or bandage can help reduce swelling. Use a brace or bandage only as directed.
- **Elevation** helps decrease pain and swelling. Elevate your knee while you are sitting or lying down. Prop your leg on pillows to keep your knee above the level of your heart.

Medicines:

- **NSAIDs** help decrease swelling and pain or fever. This medicine is available with or without a doctor's order. NSAIDs can cause stomach bleeding or kidney problems in certain people. If you take blood thinner medicine, **always** ask your healthcare provider if NSAIDs are safe for you. Always read the medicine label and follow directions.
- **Acetaminophen** decreases pain and fever. It is available without a doctor's order. Ask how much to take and when to take it. Follow directions. Acetaminophen can cause liver damage if not taken correctly.
- **Take your medicine as directed.** Call your primary healthcare provider if you think your medicine is not helping or if you have side effects. Tell him if you are allergic to any medicine. Keep a list of the medicines, vitamins, and herbs you take. Include the amounts, and when and why you take them. Bring the list or the pill bottles to follow-up visits. Carry your medicine list with you in case of an emergency.

Exercise as directed: You may need to see a physical therapist or do recommended exercises to improve



AL St. Luke's Hospital - Allentown
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Adm: 6/24/2016, D/C: 6/24/2016

Medications (continued)

movement and decrease your pain. You may be directed to walk, swim, or ride a bike. Follow your exercise plan exactly as directed to avoid further injury.

Contact your primary healthcare provider if:

- You have questions or concerns about your condition or care.

Return to the emergency department if:

- Your pain is worse, even after treatment.
- You cannot bend or straighten your leg completely.
- The swelling around your knee does not go down even with treatment.
- Your knee is painful and hot to the touch.

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The above information is an educational aid only. It is not intended as medical advice for individual conditions or treatments. Talk to your doctor, nurse or pharmacist before following any medical regimen to see if it is safe and effective for you.

Medication List

START taking these medications

meloxicam 15 mg tablet

Commonly known as: MOBIC

Take 1 tablet (15 mg total) by mouth daily as needed (pain).

Where to Get Your Medications

You can get these medications from any pharmacy

Bring a paper prescription for each of these medications

- ☐ meloxicam 15 mg tablet



AL St. Luke's Hospital - Allentown
Campus

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MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 11100117593
Adm: 6/24/2016, D/C: 6/24/2016

Flowsheets (all recorded)

Custom Formula Data - Fri June 24, 2016

| 0617 | 0618 |
|----------------------------------|----------------|
| Morse Fall Risk Scale | |
| Score | 0 -TS |
| Adult IBW/VT Calculations | |
| IBW | -88 kg -TS |
| Range VT 6 ML/Kg | -528 mL/kg -TS |
| Range VT 8 ML/Kg | -704 mL/kg -TS |
| Anthropometrics | |
| IBW (Nutrition) | -89.8 kg -TS |

Risk Factors for Infectious Disease - Fri June 24, 2016

| 0606 | 0618 |
|--|---|
| Primary Infectious Disease Screening Questions | |
| Has the patient travelled OUT OF THE COUNTRY in the last 6 months? | No recent travel out of the country -EC |
| Exposure Screening | |
| Recent contact with someone who has been sick? | No -TS |
| MDRO Screen | |
| History of: | None -EC |

Acuity/Destination - Fri June 24, 2016

| 0621 |
|----------------------------|
| Acuity/Destination: |
| Patient Acuity |
| Triage Complete |
| Triage complete -TS |

Fall Risk Assessment - Fri June 24, 2016

| 0617 |
|------------------------------|
| Morse Fall Risk Scale |
| History of Falling |
| Secondary Diagnosis |
| Ambulatory Aids |
| Intravenous |
| Therapy/Heparin/Saline Lock |
| Gait/Transferring |
| Mental Status |
| Score |
| 0 -TS |

Pain Assessment - Fri June 24, 2016

| 0618 |
|-------------------------------|
| Pain Assessment Timer |
| Restart Pain Assessment Timer |
| Yes -TS |

Musculoskeletal - Fri June 24, 2016

| 0623 |
|--------------------------|
| Musculoskeletal |
| Musculoskeletal (WDL) |
| Back Pain |
| Loss of bladder function |
| Loss of bowel function |
| No -CP |
| No -CP |
| No -CP |

LOS Charges - Fri June 24, 2016



AL St. Luke's Hospital - Allentown
Campus

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 11100117593
Adm: 6/24/2016, D/C: 6/24/2016

Flowsheets (all recorded) (continued)

LOS Charges - Fri June 24, 2016 (continued)

ED from 8/24/2016 in St
Luke's Hospital
Allentown Emergency
Department

LOS Charges
Nursing Assessments 1-2 assessments -CH

Vital Signs - Fri June 24, 2016

0618

Vital Signs
Temp 97.9 °F (36.6 °C) -TS
Pulse 60 -TS
Heart Rate Source Monitor -TS
Resp 18 -TS
BP (I) 184/93 -TS
BP Location Left arm -TS
BP Method Automatic -TS
Patient Position Sitting -TS
Oxygen Therapy
SpO2 98 % -TS
Pain Assessment
Pain Score 4 -TS
Height and Weight
Weight 91.9 kg (202 lb 9.5 oz)
-TS
Weight Method Stated -TS

Vitals Reassessment - Fri June 24, 2016

0618

Vitals-Timer
Restart Vitals Timer Yes -TS

LACE+ Score - Fri June 24, 2016

0638

OTHER
LACE+ Score 29 -AS

User Key

(r) = Recorded By, (t) = Taken By, (c) = Cosigned By

| Initials | Name | Effective Dates |
|----------|-------------------------|---------------------|
| CP | Courtney Pascarella, RN | 01/09/16 - |
| EC | Edgar Collazo | |
| TS | Tricia L Smay, RN | 01/09/16 - 07/28/16 |
| CH | Christine Harbour | |
| AS | Automated Mds System | |

Significant Event Notes

No notes of this type exist for this encounter.

Encounter-Level Documents:

There are no encounter-level documents.

Order-Level Documents:

There are no order-level documents.

Hospital account-Level Documents - 09/28/2173:

Consent Form - Electronic signature on 6/24/2016 8:08 AM



AL St. Luke's Hospital - Allentown
Campus

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 11100117593
Adm: 6/24/2016, D/C: 6/24/2016

Douglas Davis
Medical Records
File No.: 16-6980

#2
St. Luke's Radiology



BE St. Luke's Moravian

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 10100274128
Adm: 7/13/2016, D/C: 7/13/2016

Admission Information - Patient Record Only

| | | | | | |
|--------------------|----------|---------------------|-----------------------------|---------------------|--------------------|
| Arrival Date/Time: | Elective | Admit Date/Time: | 07/13/2016 1405 | IP Adm. Date/Time: | |
| Admission Type: | | Point of Origin: | Physician Or Clinic Office | Admit Category: | |
| Means of Arrival: | | Primary Service: | | Secondary Service: | N/A |
| Transfer Source: | | Service Area: | St Luke's Univ Service Area | Unit: | Be Moravian Xray |
| Admit Provider: | | Attending Provider: | | Referring Provider: | Daniel Heckman, MD |

Discharge Information - Patient Record Only

| | | | | |
|----------------------|------------------------|------------------------|---------------------|------------------|
| Discharge Date/Time: | Discharge Disposition: | Discharge Destination: | Discharge Provider: | Unit: |
| 07/13/2016 2359 | Home/self Care | None | None | Be Moravian Xray |

Final Diagnoses (ICD-10-CM)

| Code | Description | POA | CC | HAC | Affects DRG |
|------------|--|-----|----|-----|-------------|
| M25.569 JP | Pain in unspecified knee | | | | |
| M25.578 | Pain in unspecified ankle and joints of unspecified foot | | | | |

Events

| Date/Time | Event | Pt Class | Unit | Room/Bed | Service |
|---------------|---------------------|------------|------------------|----------|---------|
| 07/13/16 1405 | Hospital Outpatient | Outpatient | BE MORAVIAN XRAY | | |
| 07/13/16 2359 | Discharge | Outpatient | BE MORAVIAN XRAY | | |

Allergies as of 7/13/2016

Reviewed On: 6/24/2016 By: Richard Tabor, MD

No Known Allergies

Medical

as of 7/13/2016

Past Medical History

Diabetes mellitus
Hypertension

Date**Comments****Source**

Provider:
Provider

Surgical

as of 7/13/2016

Problem List

Reviewed: 6/24/2016 6:24 AM by Richard Tabor, MD

None

ED Arrival Information

Patient not seen in ED

Chief Complaint

None

Diagnoses

Pain in knee
Pain in ankle

ED Disposition

None

ED Notes

No notes of this type exist for this encounter.

Physician Notes

No notes of this type exist for this encounter.



BE St. Luke's Moravian

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 10100274128
Adm: 7/13/2016, D/C: 7/13/2016

Nursing Notes

No notes of this type exist for this encounter.



BE St. Luke's Moravian

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct#: 10100274128
Adm: 7/13/2016, D/C: 7/13/2016

All Orders

XR knee 4+ vw left [32313820]

Electronically signed by: Sluahn Incoming Rad Orders Interface on 07/13/16 0000

Status: Completed

Ordering user: Sluahn Incoming Rad Orders Interface 07/13/16 0000

Authorized by: Daniel Heckman, MD

Frequency: Once 07/13/16 1405 - 1 Occurrences

Diagnoses:

Pain in knee [M25.569]

Order comments:

TW Order Number: TW562036140 Performing Comments: procedure room

XR knee 3 vw right [32313822]

Electronically signed by: Sluahn Incoming Rad Orders Interface on 07/13/16 0000

Status: Completed

Ordering user: Sluahn Incoming Rad Orders Interface 07/13/16 0000

Authorized by: Daniel Heckman, MD

Frequency: Once 07/13/16 1405 - 1 Occurrences

Diagnoses:

Pain in knee [M25.569]

Order comments:

TW Order Number: TW562036990

XR ankle 3+ vw left [32313824]

Electronically signed by: Sluahn Incoming Rad Orders Interface on 07/13/16 0000

Status: Completed

Ordering user: Sluahn Incoming Rad Orders Interface 07/13/16 0000

Authorized by: Daniel Heckman, MD

Frequency: Once 07/13/16 1405 - 1 Occurrences

Diagnoses:

Pain in ankle [M25.579]

Order comments:

TW Order Number: TW562038110 Performing Comments: procedure room

All Results

XR ankle 3+ vw left

Result status: Final result

Filed by
Resulting lab:
Narrative:

Rad Results In Interface 07/14/16 1236
EMC RAD
LEFT ANKLE

Performed: 07/13/16 1405 - 07/13/16 1420

INDICATION: Twisting injury. Pain

COMPARISON: None

VIEWS: 3: 3 Images

FINDINGS:

There is no acute fracture or dislocation.

Mild degenerative changes are seen in the tibiotalar joint

No lytic or blastic lesions are seen.

Soft tissues are unremarkable.

Impression:

No acute osseous abnormality.

Workstation performed: SLT18045RR1M

XR knee 3 vw right

Result status: Final result

Filed by
Resulting lab:
Narrative:

Rad Results In Interface 07/14/16 1237
EMC RAD
RIGHT KNEE

Performed: 07/13/16 1405 - 07/13/16 1420

INDICATION: Injury. Pain



BE St. Luke's Moravian

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 10100274128
Adm: 7/13/2016, D/C: 7/13/2016

All Results (continued)**XR knee 3 vw right (continued)**

Result status: Final result

COMPARISON: None

VIEWS: 3; 3 images

FINDINGS:

There is no acute fracture or dislocation.

There is no joint effusion.

Mild joint space narrowing is seen in the medial compartment.

No lytic or blastic lesions are seen.

Soft tissues are unremarkable.

Impression:

No acute osseous abnormality.

Workstation performed: SLT18045RR1M

XR knee 4+ vw left

Result status: Final result

Filed by
Resulting lab:
Narrative:

Rad Results In Interface 07/14/16 1238
EMC RAD
LEFT KNEE

Performed: 07/13/16 1405 - 07/13/16 1420

INDICATION: Left knee pain after injury

COMPARISON: None

VIEWS: 4; 4 images

FINDINGS:

There is no acute fracture or dislocation.

There is no joint effusion.

Mild joint space narrowing seen in the medial compartment.

No lytic or blastic lesions are seen.

Soft tissues are unremarkable.

Impression:

No acute osseous abnormality.

Workstation performed: SLT18045RR1M



BE St. Luke's Moravian

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 10100274128
Adm: 7/13/2016, D/C: 7/13/2016

Medications

All Meds and Administrations

(There are no med orders for this encounter)

Education

No education to display

Medication List

Notice

This visit has been closed. A record of the med list at the time of the visit is not available.



BE St. Luke's Moravian

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 10100274128
Adm: 7/13/2016, D/C: 7/13/2016

Flowsheets (all recorded)LACE+ Score - Thu July 14, 2016

0126

OTHER

LACE + Score 14 -AS

User Key

(r) = Recorded By, (t) = Taken By, (c) = Cosigned By

InitialsNameEffective Dates

AS

Automated Mds System

Significant Event Notes

No notes of this type exist for this encounter.

Encounter-Level Documents - 07/13/2016:

Scripts - Scan on 7/13/2016 2:04 PM (below)



BE St. Luke's Moravian

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 10100274128
Adm: 7/13/2016, D/C: 7/13/2016

Encounter-Level Documents - 07/13/2016: (continued)

| St. Luke's Orthopaedic Specialists Sports Medicine | | | |
|--|--|---------------------------------|---------------------|
| 3441 Schuylkill Rd Bethlehem, PA 18018 P: (610) 526-3854 F: (610) 526-3215 Your Provider certifies that you are a St. Luke's facility while instructed by your insurance administrator. | | | |
| Performing Facility: St. Luke's Radiology | Lap Registration #: 18449060 | Account #: NHE3769210068 | |
| Patient: DOUGLAS DAVIS | DOB: 18 Jul 1964 | Sex: M | SSN #: ***-**-7644 |
| Address: 1819 GREENLEAF ST. ALLENTOWN, PA 18104 Home: (610) 437-3871 Work: (610) 437-3821 | Provider Information: PCP: Adam Dratch, D.O. NPI: 126289218 Ordering Provider: Daniel Hackman, M.D. [DH1] Approving Provider: Daniel Hackman, M.D. | | |
| Insurance: NOVITAS SOLUTIONS | Bill Type: Y | Acct: 1 | |
| Group Number: Policy Number: 316567044A PO BOX 850418 CAMP HILL, PA 170890418 18773273-0073 | Name of Insured: DAVIS DOUGLAS G Guardian: DAVIS, DOUGLAS G (Spouse) 1819 GREENLEAF ST ALLENTOWN, PA 18104 Phone: (610) 437-3821 | | |
| Order #: TW56205814008 ID: 415 | Order Name: [* XR KNEE 4+ VIEW LEFT] | | |
| Order Priority: Routine | [IM0132] | | |
| Problems: (719.40) (435.569) | Date Ordered: 13 Jul 2016 | To Be Done Date: 13 Jul 2016 | CPT4 Code: 72564 |
| Patient Instructions: | Specimen Collected: | Status: Active | |
| Performing Location Comments: Procedure room | | | |
| Approving Provider: Daniel Hackman (MID: 1226709218) Electronic Signature | | | |
| Medicare only covers services that are reasonable and necessary for the diagnosis and treatment of disease. Routine screening tests are generally not covered by Medicare. | | | |
| Order Registration | Page 1 of 1 | | |

Scripts - Scan on 7/13/2016 2:04 PM (below)



BE St. Luke's Moravian

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 10100274128
Adm: 7/13/2016, D/C: 7/13/2016

Encounter-Level Documents - 07/13/2016: (continued)

St Luke's Orthopaedic Specialists Sports Medicine
1441 Schoenrock Rd
Bethlehem, PA 18018
P: (610) 526-2094 F: (610) 526-3218
Your Provider recommends that you use St Luke's facility unless instructed by your insurance otherwise.

| | | |
|--|-----------------------------|--------------------------|
| Performing Facility: St Luke's Radiology | Lab Requisition #: 18449087 | Account #: HNE1769210068 |
|--|-----------------------------|--------------------------|

| | | | |
|------------------------|------------------|--------|------------------|
| Patient: DOUGLAS DAVIS | DOB: 18 Jul 1964 | Sex: M | SSN #: *****7044 |
|------------------------|------------------|--------|------------------|

| | |
|--|---|
| Address: 1819 GREENLEAF ST ALLENTOWN, PA 18104 Home: (610) 437-3821 Work: (610) 437-3821 | Provider Information: PCR: Adam Dratch - [DA2] NPI: 1326299218 Ordering Provider: Daniel Heckman, M.D. - [DH9] Approving Provider: Daniel Heckman, M.D. |
|--|---|

| | | |
|------------------------------|--------------|---------|
| Insurance: NOVITAS SOLUTIONS | Bill Type: T | Acc#: 1 |
|------------------------------|--------------|---------|

| | |
|--|---|
| Group Number: Policy Number: 121058704AA PO BOX 890113 CAMP HILL, PA 170090418 (877)235-8073 | Name of Insured: DOUGLAS DAVIS SUBSTANTIAL DAVIS, DOUGLAS G - [R0001] 1819 GREENLEAF ST ALLENTOWN, PA 18104 Phone: (610) 437-3821 |
|--|---|

| | |
|-------------------------------|------------------------------------|
| Order #: TW8820386000g 1019MS | Order Name: *XR KNEE 3 VIEW RIGHT* |
| Order Priority: Routine | [IM0131] |

| | | | | | |
|--------------------------------|------------------------------|---------------------------------|--------------------|-------------------|---------------------|
| Problem: (119.46) [M25.562] | Date Ordered: 13 Jul 2016 | To Be Done Date: 13 Jul 2016 | CPT Code: 73562 | Status: Active | Specimen Collected: |
|--------------------------------|------------------------------|---------------------------------|--------------------|-------------------|---------------------|

Patient Instructions:
Performing Location Comments:

Approving Provider:
Daniel Heckman [NPI: 1326299218]
Daniel Heckman
Electronic Signature

Medicare only covers services that are reasonable and necessary for the diagnosis and treatment of disease. Routine screening tests are generally not covered by Medicare.

Order Requisition: Page 1 of 1

Scripts - Scan on 7/13/2016 2:04 PM (below)



BE St. Luke's Moravian

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 10100274128
Adm: 7/13/2016, D/C: 7/13/2016

Encounter-Level Documents - 07/13/2016: (continued)

| St Luke's Orthopaedic Specialists Sports Medicine | | | | | |
|---|------------------------------|--|---------------------|--------------------------|---------------------|
| 1441 Schoonhoven Rd Bethlehem, PA 18018 P: (610) 726-3864 F: (610) 726-3218 Your Provider is licensed (and you are a St. Luke's Health System employee) by your insurance company. | | | | | |
| Performing Facility: St Luke's Radiology | | Lab Requisition #: 18449128 | | Account #: MN81769210068 | |
| Patient: DOUGLAS DAVIS | | DOB: 10/11/1964 | | Sex: M SSN #: *****7044 | |
| Address: 1810 GREENLEAF ST. ALLENTOWN, PA 18104 Home: (610) 437-1871 Work: (610) 437-3421 | | Provider Information: PCP: Adam Drelich - (10A2) NP: 1226269218 Ordering Provider: Daniel Heckman, M.D. - (DH9) Approving Provider: Daniel Heckman, M.D. | | | |
| Insurance: NOVITAS SOLUTIONS | | Bill Type: T | | Acc #: | |
| Group Number: Policy Number: 210567044A PO BOX 890418 CAMP HILL, PA 17009-0418 (877) 215-6073 | | Name of Insured: DAVIS DOUGLAS G Relationship: DAVIDS DOUGLAS G (Spouse) 1810 GREENLEAF ST ALLENTOWN, PA 18104 Phone: (610) 437-1871 | | | |
| Order #: 1769210068 ID: 8418 | | Order Name: - [X R ANKLE 3+ VIEW LEFT] - | | | |
| Order Priority: Routine | | [IMG143] | | | |
| Problems: (719.47) (H25.570) | Date Ordered: 13 Jul 2016 | To Be Done Date: 13 Jul 2016 | CPT4 Code: 79610 | Status: Active | Specimen Collected: |
| Patient Instructions: | | | | | |
| Performing Location Comments: procedure room | | | | | |
| <p>Approving Provider Daniel Heckman (NPI: 1326269218) <i>Daniel Heckman</i> Electronic Signature</p> | | | | | |
| <p>Medicare only covers services that are reasonable and necessary for the diagnosis and treatment of disease. Routine screening tests are generally not covered by Medicare.</p> | | | | | |
| Order Requisition | | Page 1 of 1 | | | |

Order-Level Documents:

There are no order-level documents.

Hospital account-Level Documents:

There are no hospital account-level documents.



AL St. Luke's Hospital - Allentown
Campus

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 11100129566
Adm: 7/24/2016, D/C: 7/24/2016

Admission Information - Patient Record Only

| | | | | | |
|--------------------|----------|---------------------|-----------------------------|---------------------|--------------------|
| Arrival Date/Time: | | Admit Date/Time: | 07/24/2016 0926 | IP Adm. Date/Time: | |
| Admission Type: | Elective | Point of Origin: | Physician Or Clinic Office | Admit Category: | |
| Means of Arrival: | | Primary Service: | | Secondary Service: | N/A |
| Transfer Source: | | Service Area: | St Luke's Univ Service Area | Unit: | Al Mrl |
| Admit Provider: | | Attending Provider: | Daniel Heckman, MD | Referring Provider: | Daniel Heckman, MD |

Discharge Information - Patient Record Only

| | | | | | | | | | |
|----------------------|-----------------|------------------------|----------------|------------------------|------|---------------------|------|-------|--------|
| Discharge Date/Time: | 07/24/2016 2359 | Discharge Disposition: | Home/self Care | Discharge Destination: | None | Discharge Provider: | None | Unit: | Al Mrl |
|----------------------|-----------------|------------------------|----------------|------------------------|------|---------------------|------|-------|--------|

Final Diagnoses (ICD-10-CM)

| Code | Description | POA | CC | HAC | Affects DRG |
|---------------------|--------------------------|-----|----|-----|-------------|
| M25.589 [Principal] | Pain in unspecified knee | | | | |

Events

| Date/Time | Event | Pl Class | Unit | Room/Bed | Service |
|---------------|---------------------|------------|--------|----------|---------|
| 07/24/16 0926 | Hospital Outpatient | Outpatient | AL MRI | | |
| 07/24/16 2359 | Discharge | Outpatient | AL MRI | | |

Allergies as of 7/24/2016

No Known Allergies

Reviewed On: 6/24/2016 By: Richard Tabor, MD

Medical

as of 7/24/2016

Past Medical History

Diabetes mellitus
Hypertension

Date

Comments

Source

Provider
Provider

Surgical

as of 7/24/2016

Problem List

None

Reviewed: 6/24/2016 6:24 AM by Richard Tabor, MD

ED Arrival Information

Patient not seen in ED

Chief Complaint

None

Diagnosis

Arthralgia of lower leg, unspecified laterality

ED Disposition

None

ED Notes

No notes of this type exist for this encounter.

Physician Notes

No notes of this type exist for this encounter.

Nursing Notes



AL St. Luke's Hospital - Allentown
Campus

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 11100129566
Adm: 7/24/2016, D/C: 7/24/2016

Nursing Notes (continued)

No notes of this type exist for this encounter.



AL St. Luke's Hospital - Allentown
Campus

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 11100129566
Adm: 7/24/2016, D/C: 7/24/2016

All Orders

MRI knee left wo contrast [32313827]

Electronically signed by: Lisa M Strittmatter on 07/13/16 1455

Ordering user: Lisa M Strittmatter 07/13/16 1455

Authorized by: Daniel Heckman, MD

Status: Completed

Frequency: Once 07/24/16 0926 - 1 Occurrences

Diagnoses:

Arthralgia of lower leg, unspecified laterality [M25.569]

Questions:

Reason for Exam: m25.569

What is the patient's sedation requirement? No Sedation

Does the patient have metallic implants? No

All Results

MRI knee left wo contrast

Result status: Final result

Filed by

Rad Results in Interface 07/25/16 1121

Performed:

07/24/16 0936 - 07/24/16 1007

Resulting lab:

EMC RAD

Narrative:

MRI LEFT KNEE

INDICATION: Generalized left knee pain and instability.

COMPARISON: Plain film dated 7/13/2016

TECHNIQUE: MR sequences were obtained of the left knee including: Localizer, axial T2 fat sat, coronal T1/T2 fat sat, sagittal PD/T2 fat sat. Images were acquired on a 1.5 Tesla unit. Gadolinium was not used.

FINDINGS:

SUBCUTANEOUS TISSUES: Normal

JOINT EFFUSION: None.

BAKER'S CYST: None.

MENISCI: Intact.

CRUCIATE LIGAMENTS: Intact.

EXTENSOR APPARATUS: Intact with superior and inferior patellar spurring.

COLLATERAL LIGAMENTS: Thickened MCL consistent with scarring from chronic injury. LCL remains intact.

ARTICULAR SURFACES: Lateral trochlear osteochondral lesion identified measuring up to 0.6 x 1.6 cm with subcortical cystic change and slight cortical depression suggesting instability.

BONE MARROW: Normal signal without fracture.

MUSCULATURE: Intact.

Impression:

1. Lateral trochlear osteochondral lesion measuring 0.6 x 1.6 cm with associated subcortical cystic change and slight cortical depression suggesting instability.
2. Thickened MCL consistent with scarring from chronic injury.
3. No evidence of meniscal tear or other internal derangement.

Workstation performed: SLH18015NM



AL St. Luke's Hospital - Allentown
Campus

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 11100129566
Adm: 7/24/2016, D/C: 7/24/2016

Medications

All Meds and Administrations

(There are no med orders for this encounter)

Education

No education to display

Medication List

Notice

This visit has been closed. A record of the med list at the time of the visit is not available.



AL St. Luke's Hospital - Allentown
Campus

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 11100129566
Adm: 7/24/2016, D/C: 7/24/2016

Flowsheets (all recorded)

LACE+ Score - Mon July 25, 2016

0120

OTHER

LACE + Score 14 -AS

User Key

(r) = Recorded By, (t) = Taken By, (c) = Coigned By

Initials

Name

Effective Dates

AS

Automated Mds System

Significant Event Notes

No notes of this type exist for this encounter.

Encounter-Level Documents - 07/24/2016:

Patient Screening - Scan on 7/26/2016 8:51 AM :

(below)



AL St. Luke's Hospital - Allentown
Campus

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 11100129566
Adm: 7/24/2016, D/C: 7/24/2016

Encounter-Level Documents - 07/24/2016: (continued)

DAVIS, Douglas G
MRN: 1769210068
Acct: 11100129566
Sex: Male Age: 53 y.o.
DOB: 7/18/1964
CSN: 1009145436

1009145436

St Luke's
UNIVERSITY HEALTH NETWORK

**MAGNETIC RESONANCE (MR)
PROCEDURE SCREENING**

Patient D.O.B.: 7-18-64 Height: 5'7 Weight: 206 Body part to be examined: Left Knee

Why are we doing the MRI exam today? What are your symptoms? Pain in knee

Have you had blood work within the last 48 hours? If yes, where: _____

- Have you had prior surgery or an operation (e.g., arthroscopy, endoscopy, etc.) of any kind? ☐ NO ☒ YES
If yes, please list: Arthroscopy, Knee Surgery
- Have you had a prior diagnostic imaging study of the body part we are imaging today (MRI, CT, Ultrasound, X-ray, etc.)? ☐ NO ☒ YES
- Do you have a history of renal/kidney disease (including one kidney tumor or transplant)? ☐ NO ☒ YES
- Do you have a history of liver disease (including tumor or transplant)? ☐ NO ☒ YES
- Are you currently on dialysis? If yes, please check one: ☒ Peritoneal ☐ Hemodialysis ☐ NO ☒ YES
- Are you diabetic? ☐ NO ☒ YES
- Do you have high blood pressure (hypertension)? ☐ NO ☒ YES
- Do you have a history of asthma, allergic reaction, respiratory disease, or reaction to a contrast medium or dye used for an MRI, CT, or X-ray examination? ☒ NO ☐ YES
- Have you experienced any problem related to a previous MRI examination or MR procedure? ☒ NO ☐ YES
If yes, please describe: _____
- Have you had an injury to the eye involving a metallic object or fragment (e.g., metallic shavings, shavings, foreign body, welding, grinding, etc.)? If yes, please describe: _____ ☒ NO ☐ YES
- Have you ever been injured by a metallic object or foreign body (e.g., BB, bullet, shrapnel, etc.)? ☒ NO ☐ YES
If yes, please describe: _____
- Are you wearing any medication patches? If yes, please remove prior to the MRI exam. ☒ NO ☐ YES
- Are you allergic to any medication? ☒ NO ☐ YES
If yes, please list: _____
- Do you have a personal history of cancer? ☒ NO ☐ YES
If yes, what type: _____
- Are you wearing magnetic nail polish? ☒ NO ☐ YES

FOR FEMALE PATIENTS:

- Date of last menstrual period: _____ Post menopausal? ☐ NO ☐ YES
- Are you pregnant or experiencing a late menstrual period? ☐ NO ☐ YES
- Are you taking oral contraceptives or receiving hormonal treatment? ☐ NO ☐ YES
- Are you taking any type of fertility medication or having fertility treatments? ☐ NO ☐ YES
If yes, please describe: _____
- Are you currently breastfeeding? ☐ NO ☐ YES

— OVER —



Form No. 6092NP Page 1 of 2 Rev. 08/13

MAGNETIC RESONANCE (MR) PROCEDURE SCREENING



UNIVERSITY HEALTH NETWORK
801 Ostrum Street
Bethlehem, PA 18015


AL St. Luke's Hospital - Allentown Campus

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 11100129566
Adm: 7/24/2016, D/C: 7/24/2016

Encounter-Level Documents - 07/24/2016: (continued)


Davis, Douglas G
 MRN: 1749210868
 Acc#: 11100139366
 Sex: Male Age: 42 y.o.
 DOB: 7/18/1964
 CSN: 1069145436

1009145438



MAGNETIC RESONANCE (MR) PROCEDURE SCREENING

WARNING: Certain implants, devices, or objects may be hazardous to you and/or may interfere with the MR procedure (i.e., MRI, MR angiography, functional MRI, MR spectroscopy). Do not enter the MR system room or MRI environment if you have any question or concern regarding an implant, device, or object. Consult the MR Technologist or Radiologist BEFORE entering the MR system room. The MR system magnet is ALWAYS on.



| | | |
|---|---|--|
| <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Cardiac or Bladder Pacemaker <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Intracranial Pressure Monitor (BOLT) <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Implanted Cardioverter Defibrillator (ICD) <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Temperature Foley <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Swan-Ganz or Thermodilution Catheter | <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Magnetically-Activated Implant Device/Prosthetic or Magnetic Dentures <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Breast Tissue Expander <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO Neurostimulation System/ Bone Growth Stimulator/ Deep Brain Stimulator | |
|---|---|--|

PLEASE INDICATE IF YOU HAVE ANY OF THE FOLLOWING:

☐ Y ☒ N Aneurysm clip(s)

☐ Y ☒ N Electronic Implant or Device

☐ Y ☒ N Internal electrodes or wires

☐ Y ☒ N Cochlear or other ear implant

☐ Y ☒ N Insulin or other drug infusion pump

☐ Y ☒ N Any type of prosthesis (eye, penile, etc.)

☐ Y ☒ N Heart valve prosthesis

☐ Y ☒ N Eyelid spring or wire

☐ Y ☒ N Artificial or prosthetic limb

☐ Y ☒ N Metallic stent, filter or embolization coils

☐ Y ☒ N Vascular access port and/or catheter

☐ Y ☒ N Wire mesh implant

☐ Y ☒ N Gastric/stomach clips from biopsy/lap banding

☐ Y ☒ N Gastric video camera Date: _____

☐ Y ☒ N Surgical staples, clips, or metallic sutures

☐ Y ☒ N Joint replacement (hip, knee, etc.)

☐ Y ☒ N Bone/joint pin, screw, nail, wire, plate, etc.

☐ Y ☒ N IUD, diaphragm, or pessary

☐ Y ☒ N Dentures or partial plates

☐ Y ☒ N Tattoo or permanent makeup

☐ Y ☒ N Body piercing jewelry

☐ Y ☒ N Claustrophobia

☐ Y ☒ N Latex Allergy

☐ Y ☒ N Ventilator

☐ Y ☒ N Hearing Aid—Remove before entering MR system room

☐ Y ☒ N Hotter Monitor—Must be removed prior to exam

☐ Y ☒ N EKG Patches—Must be removed prior to exam

☐ Y ☒ N Shunt (spinal or intraventricular)?
 Programable—Needs XRay prior to exam

☐ Y ☒ N Medication drips (If yes, please call MRI)

NOTE: You will be required to wear earplugs or other hearing protection during the MA procedure to prevent possible problems or hazards related to acoustic noise.

NOTE: "This form needs to be completed for EACH MHI visit.

I attest that the above information is correct to the best of my knowledge. I read and understand the contents of this form and had the opportunity to ask questions regarding the information on this form and regarding the MR procedure that I am about to undergo.

Signature of Person Completing Form: [Signature] Date 7/24/16

Form Completed By: ☐ Patient ☐ Relative ☐ Nurse _____

Form Information Reviewed By: [Signature] 7/24/10
SIGNATURE DATE TIME

Form No. 5092NP Page 2 of 2 Rev. 02/19 MAGNETIC RESONANCE (MR) PROCEDURE SCREENING

Scripts - Scan on 7/26/2016 6:12 AM (below)



AL St. Luke's Hospital - Allentown
Campus

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 11100129566
Adm: 7/24/2016, D/C: 7/24/2016

Encounter-Level Documents - 07/24/2016: (continued)

| | | | | | |
|--|------------------------------------|--|--|-----------------------------------|---------------------------|
| <p align="center">St Lukes Orthopaedic Specialists Sports Medicine 1441 Schoenersville Rd Bethlehem, PA 18018 P: (484) 526-3884 F: (484) 526-3216 Your Provider recommends that you use St Luke's facility unless instructed by your Insurance otherwise.</p> | | | | | |
| Performing Facility: St Lukes Radiology | | Lab Requisition #: 18451814 | | Account #: HNE1769210068 | |
| Patient: DOUGLAS DAVIS | | DOB: 18 Jul 1964 | | Sex: M | |
| Address: 1819 GREENLEAF ST ALLENTOWN, PA 18104 | | Provider Information: PCP: Adam Dratch - [DA2] NPI: 1346673902 Ordering Provider: James B Martin, PAC - [JA9] Approving Provider: James B Martin, PAC | | | |
| Home: (610) 437-3821 | | Work: (610) 437-3821 | | | |
| Insurance: NOVITAS SOLUTIONS | | Bill Type: T | | Acc #: | |
| Group Number: Policy Number: 210567044A PO BOX 490418 CAMP HILL, PA 170890418 (877) 235-8073 | | Name of Insured: DAVIS DOUGLAS G Guarantor: DAVIS, DOUGLAS G - [Spouse] 1819 GREENLEAF ST 1819 GREENLEAF ST ALLENTOWN, PA 18104 Phone: (610) 437-3821 | | | |
| Order #: TW5521083500 | | Order Name: - [MRI KNEE LEFT WO CONTRAST] - | | | |
| Order Priority: Routine | | IMG1408 | | | |
| Problems (710.46) (M25.569) | Date Ordered 13 Jul 2016 | To Be Done Date 13 Jul 2016 | CPT4 Code 73721 | Status Need Information | Specimen Collected |
| Patient Instructions: To schedule this appointment, please contact Central Scheduling at (484) 526-1000. MRI LEFT KNEE ST LUKES ALLENTOWN 1736 HAMILTON ST. 7/24/2016 930AM ARRIVE 15 MINS. PRIOR TO TEST. | | | | | |
| Performing Location Comments: | | | | | |
| <p align="center">July 18 11:00 AM W W20</p> | | | <p align="center">Approving Provider James B Martin [NPI:1346673902] <i>James Martin PAC</i> Electronic Signature</p> | | |
| <p align="center">Medicare only covers services that are reasonable and necessary for the diagnosis and treatment of disease. Routine screening tests are generally not covered by Medicare.</p> | | | | | |

Order-Level Documents:

There are no order-level documents.

Hospital account-Level Documents:

There are no hospital account-level documents.



AL St. Luke's Hospital - Allentown
Campus

DAVIS, DOUGLAS G
MRN: 1769210068
DOB: 7/18/1964, Sex: M
Acct #: 11100129566
Adm: 7/24/2016, D/C: 7/24/2016

Hospital account-Level Documents: (continued)

END OF REPORT

Douglas Davis
Medical Records
File No.: 16-6980

#3
St. Luke's Orthopaedics



501 Cetronia Rd, Suite 125
Allentown, PA, 18104
(484) 526-1735

MRN: HNE1769210068

DOB: 07/18/1964 (52)

Encounter Date: 07/13/2016 1:10PM

Patient Information: DOUGLAS DAVIS

1819 GREENLEAF ST

ALLENTOWN, PA 18104

Phone #: (H) (610) 437-3821

Assessment

1. Knee pain (719.46) (M25.569)

Plan

Ankle pain

- * XR ANKLE 3+ VIEW LEFT; Status:Active - Retrospective By Protocol Authorization; Requested for:13Jul2016;

Knee pain

- * MRI KNEE LEFT WO CONTRAST; Status:Need Information - Financial Authorization; Requested for:13Jul2016;
- * XR KNEE 3 VIEW RIGHT; Status:Active - Retrospective By Protocol Authorization; Requested for:13Jul2016;
- * XR KNEE 4+ VIEW LEFT; Status:Active - Retrospective By Protocol Authorization; Requested for:13Jul2016;

Discussion/Summary

Assessment

#1 left knee pain concerning for meniscus tear.

Plan

#1 MRI the patient's left knee, rule out tear.

#2 ice and heat as needed.

#3 follow-up after the MRI call sooner.

The treatment plan was reviewed with the patient/guardian. The patient/guardian understands and agrees with the treatment plan

Chief Complaint

1. Ankle Pain
2. Knee Pain

History of Present Illness

HPI: 51-year-old male here for initial evaluation of his left knee pain that began in April after he had a twisting injury on the escalator of the Lehigh Valley. He does complain of instability in the knee. He feels he wants to buckle on him. He complains the pain is worse in the lateral aspect of the knee. He has been using ice, rest and Tylenol for the pain. Denies numbness or tingling.

I have personally reviewed and updated the patient's past medical history, past surgical history, family history, social history, current medications, allergies, and vital signs today.

Review of Systems

Constitutional: No fever or chills, feels well, no tiredness, no recent weight loss or weight gain.

Eyes: No complaints of red eyes, no eyesight problems.

Patient: DOUGLAS G. DAVIS ""
HNE1769210068

Encounter: 07/13/2016 1:10PM **MRN:**

ENT: no complaints of loss of hearing, no nosebleeds, no sore throat.

Cardiovascular: No complaints of chest pain, no palpitations, no leg claudication or lower extremity edema.

Respiratory: No complaints of shortness of breath, no wheezing, no cough.

Gastrointestinal: No complaints of abdominal pain, no constipation, no nausea or vomiting, no diarrhea or bloody stools.

Genitourinary: No complaints of dysuria or incontinence, no hesitancy, no nocturia.

Musculoskeletal: as noted in HPI.

Integumentary: No complaints of skin rash or lesion, no itching or dry skin, no skin wounds.

Neurological: No complaints of headache, no confusion, no numbness or tingling, no dizziness.

Psychiatric: No suicidal thoughts, no anxiety, no depression.

Endocrine: No muscle weakness, no frequent urination, no excessive thirst, no feelings of weakness.

ROS reviewed.

Active Problems

1. Ankle pain (719.47) (M25.579)
2. Essential hypertension (401.9) (I10)
3. Knee pain (719.46) (M25.569)

Current Meds

1. Atenolol 25 MG Oral Tablet;
 Therapy: (Recorded:13Jul2016) to Recorded
2. Doxazosin Mesylate 1 MG Oral Tablet; Take 1 tablet by mouth at bedtime;
 Therapy: 27Aug2014 to (Evaluate:23Feb2015) Requested for: 06Apr2015; Last
 Rx:27Aug2014; Status: ACTIVE - Renewal Denied Ordered
3. HumaLOG KwikPen 100 UNIT/ML SOLN;
 Therapy: (Recorded:13Jul2016) to Recorded
4. Lisinopril 5 MG Oral Tablet;
 Therapy: (Recorded:13Jul2016) to Recorded
5. Renvela 800 MG Oral Tablet;
 Therapy: (Recorded:13Jul2016) to Recorded

Allergies

1. No Known Drug Allergies

Vitals

Vital Signs [Data Includes: Current Encounter]

Heart Rate: 73
 Systolic: 168
 Diastolic: 96
 Height: 5 ft 7 in
 Weight: 205 lb
 BMI Calculated: 32.11
 BSA Calculated: 2.04

Physical Exam

(Tenderness lateral joint line, positive McMurray's, positive Thessaly stable to anterior, posterior drawer, stable to valgus varus stress. Neurovascularly intact. Range of motion 0-120)

Constitutional - General appearance: Normal.

Musculoskeletal - Gait and station: Normal. Digits and nails: Normal. Muscle strength/tone: Normal.

Cardiovascular - Pulses: Normal. Examination of extremities for edema and/or varicosities: Normal.

Skin - Skin and subcutaneous tissue: Normal.

Neurologic - Sensation: Normal.

Psychiatric - Orientation to person, place, and time: Normal. Mood and affect: Normal.

Eyes

Conjunctiva and lids: Normal.

Pupils and irises: Normal.

Patient: DOUGLAS G. DAVIS ""
HNE1769210068

Encounter: 07/13/2016 1:10PM

MIRN:

Results/Data

I personally reviewed the films/images/results in the office today. My interpretation follows.

X-ray Review Regards the patient's bilateral knees reveal minimal degenerative changes without acute osseous Abnormality

Radiographs the patient's left ankle reveal no acute osseous Abnormality and minimal degenerative changes.

Attending Note

Collaborating Physician Note: Collaborating Note: I interviewed and examined the patient, I supervised the Advanced Practitioner and I agree with the Advanced Practitioner note.

Future Appointments

| Date/Time | Provider | Specialty | Site |
|---------------------|-----------------------|--------------------|-------------------------------------|
| 08/03/2016 09:30 AM | Heckman, Daniel, M.D. | Orthopedic Surgery | ST LUKES ORTH SPECIALISTS SPORTS |

Signatures

Electronically signed by : James B Martin, PAC; Jul 13 2016 3:47PM EST

(Author)

Electronically signed by : Daniel Heckman, M.D.; Jul 13 2016 6:59PM EST

(Author)

***** IMPORTANT INFORMATION ABOUT YOUR MEDICATIONS *****

Please carefully review your medication list after each visit to verify that the list is accurate and up to date. Please call our office if there are medications missing from the list, medications on the list that you are not currently taking, or there is a dosage or instruction that is different from how you are taking a medication. Thank you for being involved in helping to keep your record current and accurate.

PATIENT ACCESS TO YOUR HEALTH RECORD

St. Luke's Physician Group has a new online service that connects you to your health information through eVantageHealth. This is a secure, user-friendly personal health record with tools and resources you can use to better manage your health and coordinate care. This free service is provided by eVantageHealth.

For information on how to log on and start using this service, please call 484-526-8893 or log into www.evantagehealth.com and follow the instructions.



501 Cetronia Rd, Suite 125
Allentown, PA, 18104
(484) 526-1735

MRN: HNE1769210068

DOB: 07/18/1964 (52)

Encounter Date: 08/03/2016 9:30AM

Patient Information: DOUGLAS DAVIS

1819 GREENLEAF ST

ALLENTOWN, PA 18104

Phone #:(H) (610) 437-3821

Assessment

1. Knee pain (719.46) (M25.569)

Plan

Knee pain

- Start: Meloxicam 7.5 MG Oral Tablet; ONE TO TWO TABLETS BY MOUTH DAILY
- Apply an ice pack as needed for pain twice a day for 20 minutes.; Status:Complete; Done: 03Aug2016
- *1 - SL Physical Therapy Physical Therapy Consult left lateral trochlea OCD, 1-3x per week for 6 weeks, focus on quad/hip/hamstring strengthening, ITB / hamstring stretches Status: Active Requested for: 03Aug2016 (MU) Care Summary provided. : Yes

Discussion/Summary

Assessment:

1. Left lateral trochlea osteochondral defect

Plan:

1. Treatment options reviewed with the patient. He does not have clear mechanical symptoms at this point. I would like to give him a trial of conservative treatment with physical therapy. He will also use non-straddles and ice as needed. He will follow-up in one month.

History of Present Illness

HPI: 52-year-old male follow-up left knee pain. Pain is mostly anterolateral. His symptoms began in April after he twisted his injury on the escalator. He is here to review his MRI.

The patient's medical history, surgical history, social history, family history, medications, allergies, and review of systems were reviewed and updated today.

Review of Systems:

Constitutional: No fever or chills, feels well, no tiredness, no recent weight gain or loss.

Eyes: No complaints of eyesight problems, no red eyes.

ENT: No loss of hearing, no nosebleeds, no sore throat.

Cardiovascular: No chest pain, palpitations, leg claudication, or lower extremity edema.

Respiratory: No shortness of breath, wheezing, or cough.

Gastrointestinal: No abdominal pain, constipation, nausea / vomiting, no diarrhea.

Genitourinary: No dysuria or incontinence.

Musculoskeletal: As noted in HPI.

Integumentary: No rash or skin lesions, no itching or dry skin, no wounds.

Neurological: No headache, confusion, numbness or tingling, or dizziness.

Endocrine: No muscle weakness, frequent urination, or excessive thirst

Psychiatric: No suicidal thoughts, anxiety, or depression.

Patient: DOUGLAS G. DAVIS ""
HNE1769210068

Encounter: 08/03/2016 9:30AM **MRN:**

Active Problems

1. Ankle pain (719.47) (M25.579)
2. Essential hypertension (401.9) (I10)
3. Knee pain (719.46) (M25.569)

Current Meds

1. Atenolol 25 MG Oral Tablet;
Therapy: (Recorded:13Jul2016) to Recorded
2. Doxazosin Mesylate 1 MG Oral Tablet; Take 1 tablet by mouth at bedtime;
Therapy: 27Aug2014 to (Evaluate:23Feb2015) Requested for: 06Apr2015; Last
Rx:27Aug2014; Status: ACTIVE - Renewal Denied Ordered
3. HumaLOG KwikPen 100 UNIT/ML SOLN;
Therapy: (Recorded:13Jul2016) to Recorded
4. Lisinopril 5 MG Oral Tablet;
Therapy: (Recorded:13Jul2016) to Recorded
5. Renvela 800 MG Oral Tablet;
Therapy: (Recorded:13Jul2016) to Recorded

Allergies

1. No Known Drug Allergies

Vitals

Vital Signs

Systolic: 159
 Diastolic: 86
 Heart Rate: 71
 Height: 5 ft 7 in
 Weight: 206 lb 4 oz
 BMI Calculated: 32.3
 BSA Calculated: 2.05

Physical Exam

Left Knee: Appearance: Normal except. Tenderness: None except the. ROM: Full except as noted: Motor: Normal except as noted:
 Special Test: Negative except. (No effusion, Tender along the lateral femoral condyle and lateral patellofemoral joint.
 Patella tracks centrally with mild crepitus. Pain with patellar compression. Ligaments are stable. Negative
 McMurray. Range of motion 0-135°)

Constitutional - General appearance: Normal.

Musculoskeletal - Gait and station: Normal. Digits and nails: Normal. Muscle strength/tone: Normal.

Cardiovascular - Pulses: Normal. Examination of extremities for edema and/or varicosities: Normal.

Skin - Skin and subcutaneous tissue: Normal.

Neurologic - Sensation: Normal.

Psychiatric - Orientation to person, place, and time: Normal. Mood and affect: Normal.

Eyes

Conjunctiva and lids: Normal.

Pupils and irises: Normal.

Results/Data

I personally reviewed the films/images/results in the office today. My interpretation follows.

MRI Review Left knee: Osteochondral defect in the lateral trochlea. Menisci and ligaments are intact.

Future Appointments

| Date/Time | Provider | Specialty | Site |
|---------------------|-----------------------|--------------------|-------------------------------------|
| 08/31/2016 09:30 AM | Heckman, Daniel, M.D. | Orthopedic Surgery | ST LUKES ORTH SPECIALISTS SPORTS |

Patient: DOUGLAS G. DAVIS ""
HNE1769210068

Encounter: 08/03/2016 9:30AM

MRN:

Signatures

Electronically signed by : Daniel Heckman, M.D.; Aug 3 2016 6:08PM EST

(Author)

***** IMPORTANT INFORMATION ABOUT YOUR MEDICATIONS *****

Please carefully review your medication list after each visit to verify that the list is accurate and up to date. Please call our office if there are medications missing from the list, medications on the list that you are not currently taking, or there is a dosage or instruction that is different from how you are taking a medication. Thank you for being involved in helping to keep your record current and accurate.

PATIENT ACCESS TO YOUR HEALTH RECORD

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For information on how to log on and start using this service, please call 484-526-8893 or log into www.evantagehealth.com and follow the instructions.



501 Cetronia Rd, Suite 125
Allentown, PA, 18104
(484) 526-1735

MRN: HNE1769210068 DOB: 07/18/1964 (52)
Encounter Date: 08/31/2016 9:30AM
Patient Information: DOUGLAS DAVIS
1819 GREENLEAF ST
ALLENTOWN, PA 18104
Phone #: (H) (610) 437-3821

Assessment

1. Osteochondral defect of condyle off femur (738.8) (M95.8)

Plan

Osteochondral defect of condyle of femur

- Apply an ice pack as needed for pain twice a day for 20 minutes.; Status: Complete; Done: 31Aug2016
- Follow Up After Surgery Evaluation and Treatment Follow-up Status: Hold For - Scheduling Requested for: 31Aug2016
- Home Exercise Program Evaluation and Treatment Follow-up Status: Complete Done: 31Aug2016

Discussion/Summary

Assessment

#1 osteochondral defect of the left lateral trochlea

Plan

#1 review the risks and benefits of surgery with the patient elected to proceed with arthroscopy with chondroplasty versus microfracture of the trochlea. Consent was obtained
#2 he'll follow-up 4-5 days after surgery. Call sooner if needed

The treatment plan was reviewed with the patient/guardian. The patient/guardian understands and agrees with the treatment plan

Chief Complaint

1. Knee Pain

History of Present Illness

HPI: 52-year-old male here for evaluation of his left knee osteochondral defect of the lateral trochlea. He denies catching or locking, but does complain of pain with going up and down steps. Denies numbness, tingling, or instability. He has participated in one month therapeutic exercises without change in his symptoms

I have personally reviewed and updated the patient's past medical history, past surgical history, family history, social history, current medications, allergies, and vital signs today.

Review of Systems

Constitutional: No fever or chills, feels well, no tiredness, no recent weight loss or weight gain.

Eyes: No complaints of red eyes, no eyesight problems.

ENT: no complaints of loss of hearing, no nosebleeds, no sore throat.

Cardiovascular: No complaints of chest pain, no palpitations, no leg claudication or lower extremity edema.

Respiratory: No complaints of shortness of breath, no wheezing, no cough.

Gastrointestinal: No complaints of abdominal pain, no constipation, no nausea or vomiting, no diarrhea or bloody stools.

Patient: DOUGLAS G. DAVIS
HNE1769210068

Encounter: 08/31/2016 9:30AM

MRN:

Genitourinary: No complaints of dysuria or incontinence, no hesitancy, no nocturia.

Musculoskeletal: as noted in HPI.

Integumentary: No complaints of skin rash or lesion, no itching or dry skin, no skin wounds.

Neurological: No complaints of headache, no confusion, no numbness or tingling, no dizziness.

Psychiatric: No suicidal thoughts, no anxiety, no depression.

Endocrine: No muscle weakness, no frequent urination, no excessive thirst, no feelings of weakness.

ROS reviewed.

Active Problems

1. Ankle pain (719.47) (M25.579)
2. Essential hypertension (401.9) (I10)

Current Meds

1. Atenolol 25 MG Oral Tablet;
Therapy: (Recorded:13Jul2016) to Recorded
2. Doxazosin Mesylate 1 MG Oral Tablet; Take 1 tablet by mouth at bedtime;
Therapy: 27Aug2014 to (Evaluate:23Feb2015) Requested for: 06Apr2015; Last
Rx:27Aug2014; Status: ACTIVE - Renewal Denied Ordered
3. Humalog KwikPen 100 UNIT/ML SOLN;
Therapy: (Recorded:13Jul2016) to Recorded
4. Lisinopril 5 MG Oral Tablet;
Therapy: (Recorded:13Jul2016) to Recorded
5. Meloxicam 7.5 MG Oral Tablet; ONE TO TWO TABLETS BY MOUTH DAILY;
Therapy: 03Aug2016 to (Evaluate:02Oct2016) Requested for: 03Aug2016; Last
Rx:03Aug2016 Ordered
6. Renvela 800 MG Oral Tablet;
Therapy: (Recorded:13Jul2016) to Recorded

Allergies

1. No Known Drug Allergies

Vitals

Vital Signs

Systolic: 150, Sitting
Diastolic: 93, Sitting
Heart Rate: 71
Weight: 207 lb 2 oz
BMI Calculated: 32.44
BSA Calculated: 2.05

Physical Exam

Left Knee: Appearance: Normal except. Tenderness: None except the. ROM: Full except as noted: Motor: Normal except as noted:
Special Test: Negative except. (Positive patellar grind. Stable to valgus varus stress, anterior posterior drawer.
Neurovascularly intact. Quad strength 5 out of 5. Patella tracks centrally)

Constitutional - General appearance: Normal.

Musculoskeletal - Gait and station: Normal. Digits and nails: Normal. Muscle strength/tone: Normal.

Cardiovascular - Pulses: Normal. Examination of extremities for edema and/or varicosities: Normal.

Skin - Skin and subcutaneous tissue: Normal.

Neurologic - Sensation: Normal.

Psychiatric - Orientation to person, place, and time: Normal. Mood and affect: Normal.

Eyes

Conjunctiva and lids: Normal.

Pupils and irises: Normal.

Attending Note

Collaborating Physician Note: Collaborating Note: I interviewed and examined the patient, I supervised the
Advanced Practitioner and I agree with the Advanced Practitioner note.

Patient: DOUGLAS G. DAVIS
HNE1769210068

Encounter: 08/31/2016 9:30AM

MRN:

Surgery Scheduling Form

Surgery Schedule Form St Luke Standard:

Location: Allentown

Confirmation Number:

Procedure Date: 1/23/17

Requested Time: No Preference

Surgeon: Heckman

Co-Surgeon:

Hospital PAC Required: No

Bed: Out Patient - No Bed Required

Anesthesia: Choice

PROCEDURE DETAILS

Procedure: Left knee arthroscopy, microfracture, lateral femur

Laterality/Level: Left

Anticipated frozen section: NO

Procedure Codes: 29879

Pre-op diagnosis: Osteochondral defect, lateral femur

Diagnosis Code(s): M95.8

Case Length: 60 minutes.

Equipment:

Equipment Needs: Arthroscopy tower chondral picks

Implants:

Is the patient able to walk up a flight of stairs, walk up a hill or do heavy housework WITHOUT having chest pain or shortness of breath? YES.

REGISTRATION & FINANCIAL CLEARANCE

FA Initials:

Insurance:¹ MEDICARE

Policy Number:¹ 210567044T **Group Number:**

Pre-cert &/or Referral number:¹ N/A

PRE-ADMISSION TESTING/CLINICAL INFORMATION

PAT Location: Allentown

Primary Care Physician:¹ DR. MEYERS

CONSULTS NEEDED:

Anesthesia Consult: YES, Anesthesia consult with

Medical Consult: YES, Medical consult with DR MEYERS 1/11 W/ EKG AND H&P

Cardiac Consult: No Cardiac consult needed

ALLERGIES AND ALERTS

Latex Allergy: NO

Penicillin Allergy: NO

Malignant Hyperthermia: NO

Diabetic Patient: YES

COMMENTS

Scheduling Information Provided By:¹ DEBI 484.526.7683

CASE MANAGEMENT:

¹ *Amended By: Wysocki, Deborah; Dec 28 2016 12:07 PM EST*

Signatures

Electronically signed by : James B Martin, PAC; Aug 31 2016 4:46PM EST

Electronically signed by : Daniel Heckman, M.D.; Dec 28 2016 5:04PM EST

(Author)

(Author)

Patient: DOUGLAS G. DAVIS
HNE1769210068

Encounter: 08/31/2016 9:30AM

MRN:

***** IMPORTANT INFORMATION ABOUT YOUR MEDICATIONS *****

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PATIENT ACCESS TO YOUR HEALTH RECORD

St. Luke's Physician Group has a new online service that connects you to your health information through eVantageHealth. This is a secure, user-friendly personal health record with tools and resources you can use to better manage your health and coordinate care. This free service is provided by eVantageHealth.

For information on how to log on and start using this service, please call 484-526-8893 or log into www.evantagehealth.com and follow the instructions.



501 Cetronia Rd, Suite 125
Allentown, PA, 18104
(484) 526-1735

MRN: HNE1769210068

DOB: 07/18/1964 (52)

Encounter Date: 12/28/2016 10:50AM

Patient Information: DOUGLAS DAVIS

1819 GREENLEAF ST

ALLENTOWN, PA 18104

Phone #:(H) (610) 437-3821

Assessment

1. Osteochondral defect of condyle of femur (738.8) (M95.8)

Plan

Osteochondral defect of condyle of femur

- ECG 12-LEAD; Status:Hold For - Scheduling,Retrospective By Protocol Authorization; Requested for:28Dec2016;
- Pre Op History And Physical; Status:Active - Retrospective By Protocol Authorization; Requested for:28Dec2016;

Discussion/Summary

Left lateral trochlear osteochondral defect

1. Treatment options were again reviewed with the patient. He is interested in attempting arthroscopy with chondroplasty versus microfracture and possible lateral release. Risks and benefits were reviewed. Consent was signed. Follow-up postoperatively.

Chief Complaint

1. Knee Pain

History of Present Illness

HPI: 52-year-old male follow-up left lateral trochlear osteochondral defect. He continues to have lateral peripatellar pain. Planning have an arthroscopy in August but then became ill. He is on dialysis for chronic renal failure. Symptoms in his knee are unchanged. He has failed physical therapy and multiple corticosteroid injections.

The patient's medical history, surgical history, social history, family history, medications, allergies, and review of systems were reviewed and updated today.

Review of Systems:

Constitutional: No fever or chills, feels well, no tiredness, no recent weight gain or loss.

Eyes: No complaints of eyesight problems, no red eyes.

ENT: No loss of hearing, no nosebleeds, no sore throat.

Cardiovascular: No chest pain, palpitations, leg claudication, or lower extremity edema.

Respiratory: No shortness of breath, wheezing, or cough.

Gastrointestinal: No abdominal pain, constipation, nausea / vomiting, no diarrhea.

Genitourinary: No dysuria or incontinence.

Musculoskeletal: As noted in HPI.

Integumentary: No rash or skin lesions, no itching or dry skin, no wounds.

Neurological: No headache, confusion, numbness or tingling, or dizziness.

Endocrine: No muscle weakness, frequent urination, or excessive thirst.

Psychiatric: No suicidal thoughts, anxiety, or depression.

Patient: DOUGLAS G. DAVIS
HNE1769210068

Encounter: 12/28/2016 10:50AM

MRN:

Active Problems

1. Ankle pain (719.47) (M25.579)
2. Essential hypertension (401.9) (I10)
3. Osteochondral defect of condyle of femur (738.8) (M95.8)

Current Meds

1. Atenolol 25 MG Oral Tablet;
Therapy: (Recorded:13Jul2016) to Recorded
2. Doxazosin Mesylate 1 MG Oral Tablet, Take 1 tablet by mouth at bedtime;
Therapy: 27Aug2014 to (Evaluate:23Feb2015) Requested for: 06Apr2015; Last
Rx:27Aug2014; Status: ACTIVE - Renewal Denied Ordered
3. HumaLOG KwikPen 100 UNIT/ML SOLN;
Therapy: (Recorded:13Jul2016) to Recorded
4. Lisinopril 5 MG Oral Tablet;
Therapy: (Recorded:13Jul2016) to Recorded
5. Meloxicam 7.5 MG Oral Tablet; ONE TO TWO TABLETS BY MOUTH DAILY;
Therapy: 03Aug2016 to (Evaluate:02Oct2016) Requested for: 03Aug2016; Last
Rx:03Aug2016 Ordered
6. Renvela 800 MG Oral Tablet;
Therapy: (Recorded:13Jul2016) to Recorded

Allergies

1. No Known Drug Allergies

Vitals

Vital Signs

Heart Rate: 76
Systolic: 148
Diastolic: 75
Height: 5 ft 7 in
Weight: 193 lb 2.08 oz
BMI Calculated: 30.25
BSA Calculated: 1.99

Physical Exam

Left Knee: Appearance: Normal except. Tenderness: None except the. ROM: Full except as noted: Motor: Normal except as noted:
Special Test: Negative except. (Trace effusion. Tender over the lateral trochlea and the lateral patellar facet. patella
tracks centrally with mild crepitus. Ligaments are stable. Range of motion is 0-135°)

Constitutional - General appearance: Normal.

Musculoskeletal - Gait and station: Normal. Digits and nails: Normal. Muscle strength/tone: Normal.

Cardiovascular - Pulses: Normal. Examination of extremities for edema and/or varicosities: Normal. Heart - RRR,
no murmurs, no rubs, no gallops.

Respiratory - Lungs - Clear to auscultation bilaterally, no rales, no rhonci, no wheezes.

Skin - Skin and subcutaneous tissue: Normal.

Neurologic - Sensation: Normal.

Psychiatric - Orientation to person, place, and time: Normal. Mood and affect: Normal.

Eyes

Conjunctiva and lids: Normal.

Pupils and irises: Normal.

Surgery Scheduling Form

Surgery Schedule Form St Luke Standard:

Location: Allentown

Confirmation Number:

PROCEDURE DETAILS

Procedure Date:

Requested Time:

Patient: DOUGLAS G. DAVIS
HNE1769210068

Encounter: 12/28/2016 10:50AM

MRN:

Surgeon: Heckman

Co-Surgeon:

Hospital PAC Required: No

Bed: Out Patient - No Bed Required

Procedure: Left knee arthroscopy, chondroplasty versus microfracture, possible lateral release

Laterality/Level: Left

Case Length: 60.

Anticipated frozen section:

Anesthesia: Choice

Procedure Codes: 29879

Pre-op diagnosis:

Diagnosis Code(s): m95 8

Equipment:

Equipment Needs: Knee arthroscopy

Implants:

Is the patient able to walk up a flight of stairs, walk up a hill or do heavy housework WITHOUT having chest pain or shortness of breath?

REGISTRATION & FINANCIAL CLEARANCE

FA Initials:

Insurance:

Policy Number: Group Number:

PRE-ADMISSION TESTING/CLINICAL INFORMATION

PAT Location: Allentown

CONSULTS NEEDED:

Anesthesia Consult: YES, Anesthesia consult with

Medical Consult:

Cardiac Consult:

ALLERGIES AND ALERTS

Latex Allergy: NO

Penicillin Allergy: NO

Malignant Hyperthermia: NO

Diabetic Patient: NO

COMMENTS

Scheduling Information Provided By:

CASE MANAGEMENT:

Future Appointments

| Date/Time | Provider | Specialty | Site |
|---------------------|-----------------------|--------------------|--|
| 01/23/2017 09:30 AM | Heckman, Daniel, M.D. | Orthopedic Surgery | ST LUKES HOSPITAL ALLENTOWN OR |
| 01/27/2017 10:00 AM | Heckman, Daniel, M.D. | Orthopedic Surgery | ST LUKE'S ORTHO SPECIALISTS ALLENTOWN |

Signatures

Electronically signed by : Daniel Heckman, M.D.; Dec 28 2016 1:19PM EST

(Author)

***** IMPORTANT INFORMATION ABOUT YOUR MEDICATIONS *****

Please carefully review your medication list after each visit to verify that the list is accurate and up to date. Please call our office if there are medications missing from the list, medications on the list that you are not

Patient: DOUGLAS G. DAVIS
HNE1769210068

Encounter: 12/28/2016 10:50AM

MRN:

currently taking, or there is a dosage or instruction that is different from how you are taking a medication. Thank you for being involved in helping to keep your record current and accurate.

PATIENT ACCESS TO YOUR HEALTH RECORD

St. Luke's Physician Group has a new online service that connects you to your health information through eVantageHealth. This is a secure, user-friendly personal health record with tools and resources you can use to better manage your health and coordinate care. This free service is provided by eVantageHealth.

For information on how to log on and start using this service, please call 484-526-8803 or log into www.evantagehealth.com and follow the instructions.



501 Cetronia Rd, Suite 125
Allentown, PA, 18104
(484) 526-1735

MRN: HNE1769210068 DOB: 07/18/1964 (52)
Encounter Date: 01/23/2017 9:30AM
Patient Information: DOUGLAS DAVIS
1819 GREENLEAF ST
ALLENTOWN, PA 18104
Phone #:(H) (610) 437-3821

Op Note by Daniel Heckman, MD at 1/23/2017 3:33 PM

| | | |
|--|------------------------------------|------------------------|
| Author: Daniel Heckman, MD | Service: Orthopedics | Author Type: Physician |
| Filed: 1/23/2017 5:33 PM | Date of Service: 1/23/2017 3:33 PM | Status: Signed |
| Editor: Daniel Heckman, MD (Physician) | | |

OPERATIVE REPORT

PATIENT NAME: Douglas G Davis
DOB: 7/18/1964
MRN: 1769210068
Pt Location: AL OR ROOM 08

SURGERY DATE: 1/23/2017

SURGEON(S) and ROLE:
Primary: Daniel Heckman, MD
Assisting: James B Martin, PA-C

NOTE: The presence of a physician assistant was necessary to help with patient positioning, surgical exposure, wound retraction, wound closure, and other key portions of the procedure. No qualified resident was available for this case.

PREOPERATIVE DIAGNOSES:
Left Knee
Osteochondral Lesion of Lateral Trochlea

POSTOPERATIVE DIAGNOSES:
Left Knee
Osteochondral Lesion of Lateral Trochlea

PROCEDURES:
Left Knee Arthroscopy with:
Microfracture of Lateral Trochlea

ANESTHESIA TYPE: General LMA and Intra-articular block

Op Note by Daniel Heckman, MD at 1/23/2017 3:33 PM (continued)

ANESTHESIA STAFF:

Anesthesiologist: Michael Harmelin, DO

ESTIMATED BLOOD LOSS: 2 mL

TOURNIQUET TIME: * No tourniquets in log *

PERIOPERATIVE ANTIBIOTICS: cefazolin, 2 grams

IMPLANTS: none

* No implants in log *

SPECIMENS: * No specimens in log *

DRAINS: None

OPERATIVE INDICATIONS:

The patient is a 52 y.o. male with left anterior knee pain due to a lateral trochlea osteochondral defect. Surgical treatment was indicated due to persistent symptoms despite non-surgical treatment. After a thorough discussion of the potential risks, benefits, and alternative treatments, the patient agreed to proceed with surgery. The patient understands that the risks of surgery include, but are not limited to: infection, neurovascular injury, wound healing complications, venous thromboembolism, persistent pain, stiffness, instability, recurrence of symptoms, potential need for additional surgeries, and loss of limb or life. Oral and written consent for surgery was obtained from the patient preoperatively.

EXAM UNDER ANESTHESIA:

Neutral alignment

ROM: 0-135 degrees

Ligaments stable to varus stress / valgus stress / Lachman / posterior drawer; negative pivot-shift

Patella tracking normal without crepitus.

PROCEDURE AND TECHNIQUE:

On the day of surgery, the patient was identified in the preoperative holding area. The operative site was marked by the surgeon. The patient was taken into the operating room. A time-out was conducted to confirm the patient's identity, the operative site, and the proposed procedure. The patient was anesthetized, and perioperative antibiotics were administered. The patient was positioned supine on the OR table. All bony prominences were padded. A tourniquet was not used. The operative site was prepped and draped using standard sterile technique.

An anterolateral portal was established, and the arthroscope was inserted into the knee joint. An anteromedial portal was established under direct visualization, and diagnostic arthroscopy was performed. The joint demonstrated mild synovitis.

In the patellofemoral compartment, the trochlea demonstrated a focal grade 4 chondral defect in the lateral trochlea measuring 5 mm by 30 mm which was treated with microfracture. The patella demonstrated pristine articular cartilage. The patella tracking was normal.

In the medial compartment, the medial femoral condyle demonstrated pristine articular cartilage. The medial tibial plateau demonstrated pristine articular cartilage. The medial meniscus was intact.

Op Note by Daniel Heckman, MD at 1/23/2017 3:33 PM (continued)

In the lateral compartment, the lateral femoral condyle demonstrated pristine articular cartilage. The lateral tibial plateau demonstrated pristine articular cartilage. The lateral meniscus was intact. .

In the intercondylar notch, the PCL was intact. The ACL was intact.

At the conclusion of the procedure, the instruments were withdrawn. The portals and incisions were closed with absorbable sutures and steri-strips. A sterile dressing was applied. The surgical drapes were removed. A soft bandage was applied to the operative knee. The patient was awakened from anesthesia and transported to the PACU in stable condition.

COMPLICATIONS: None

PATIENT DISPOSITION: PACU

SIGNATURE: Daniel Heckman, MD

DATE: January 23, 2017

TIME: 5:30 PM

Received for: Daniel Heckman M.D. Jan 23 2017 5:34PM Eastern Standard Time

***** IMPORTANT INFORMATION ABOUT YOUR MEDICATIONS *****

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501 Cetronia Rd, Suite 125
Allentown, PA, 18104
(484) 526-1735

MIRN: HNE1769210068

DOB: 07/18/1964 (52)

Encounter Date: 01/27/2017 10:00AM

Patient Information: DOUGLAS DAVIS

1819 GREENLEAF ST

ALLENTOWN, PA 18104

Phone #: (H) (610) 437-3821

Assessment

1. Osteochondral defect of condyle of femur (738.8) (M95.8)

Plan

Osteochondral defect of condyle of femur

- Start: OxyCODONE HCl - 5 MG Oral Tablet; TAKE 1 TO 2 TABLETS EVERY 4 HOURS AS NEEDED FOR PAIN
- Apply an ice pack as needed for pain twice a day for 20 minutes.; Status: Complete; Done: 27Jan2017
- Follow-up visit in 6 weeks Evaluation and Treatment Follow-up Status: Complete Done: 27Jan2017
- Home Exercise Program Evaluation and Treatment Follow-up Status: Complete Done: 27Jan2017

Discussion/Summary

Assessment

#1 status post left knee arthroscopy with microfracture of the lateral trochlea

Plan

#1 weightbearing as tolerated.

#2 ice and Tylenol.

#3 follow-up in or to 6 weeks call sooner if needed.

Chief Complaint

knee pain

Post-Op

HPI: 52 yr old male here to follow-up from his left knee arthroscopy with microfracture lateral femoral condyle 1/23/17.

I have personally reviewed and updated the patient's past medical history, past surgical history, family history, social history, current medications, allergies, and vital signs today.

Review of Systems

Constitutional: No fever or chills, feels well, no tiredness, no recent weight loss or weight gain.

Eyes: No complaints of red eyes, no eyesight problems.

ENT: no complaints of loss of hearing, no nosebleeds, no sore throat.

Cardiovascular: No complaints of chest pain, no palpitations, no leg claudication or lower extremity edema.

Respiratory: No complaints of shortness of breath, no wheezing, no cough.

Gastrointestinal: No complaints of abdominal pain, no constipation, no nausea or vomiting, no diarrhea or bloody stools.

Genitourinary: No complaints of dysuria or incontinence, no hesitancy, no nocturia.

Musculoskeletal: as noted in HPI.

Patient: DOUGLAS G. DAVIS
HNE1769210068

Encounter: 01/27/2017 10:00AM

MRN:

Integumentary: No complaints of skin rash or lesion, no itching or dry skin, no skin wounds.

Neurological: No complaints of headache, no confusion, no numbness or tingling, no dizziness.

Psychiatric: No suicidal thoughts, no anxiety, no depression.

Endocrine: No muscle weakness, no frequent urination, no excessive thirst, no feelings of weakness.

ROS reviewed

Active Problems

1. Ankle pain (719.47) (M25.579)
2. Essential hypertension (401.9) (I10)
3. Osteochondral defect of condyle of femur (738.8) (M95.8)

Current Meds

1. Atenolol 25 MG Oral Tablet;
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Therapy: 27Aug2014 to (Evaluate:23Feb2015) Requested for: 06Apr2015; Last Rx:27Aug2014; Status: ACTIVE - Renewal Denied Ordered
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Therapy: (Recorded:13Jul2016) to Recorded
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Therapy: 03Aug2016 to (Evaluate:02Oct2016) Requested for: 03Aug2016; Last Rx:03Aug2016 Ordered
6. Renvela 800 MG Oral Tablet;
Therapy: (Recorded:13Jul2016) to Recorded

Allergies

1. No Known Drug Allergies

Vitals

| | Recorded: 27 Jan 2017 03:20PM |
|----------------|-------------------------------|
| Heart Rate | 67 |
| Systolic | 147 |
| Diastolic | 83 |
| Height | 5 ft 7 in |
| Weight | 195 lb 2 oz |
| BMI Calculated | 30.56 |
| BSA Calculated | 2 |

Physical Exam

Left Knee: Appearance: Normal except. Tenderness: None except the. ROM: Full except as noted. Motor: Normal except as noted.
 Special Test: Negative except. (Incisions clean and dry. Full range of motion intact, minimal edema or effusion)

Constitutional - General appearance: Normal.

Musculoskeletal - Gait and station: Normal. Digits and nails: Normal. Muscle strength/tone: Normal.

Cardiovascular - Pulses: Normal. Examination of extremities for edema and/or varicosities: Normal.

Skin - Skin and subcutaneous tissue: Normal.

Neurologic - Sensation: Normal.

Psychiatric - Orientation to person, place, and time: Normal. Mood and affect: Normal.

Eyes

Conjunctiva and lids: Normal.

Pupils and irises: Normal.

Patient: DOUGLAS G. DAVIS
HNE1769210068

Encounter: 01/27/2017 10:00AM

MRN:

Attending Note

Collaborating Physician Note: Collaborating Physician: I interviewed and examined the patient, I supervised the Advanced Practitioner and I agree with the Advanced Practitioner note.

Future Appointments

| Date/Time | Provider | Specialty | Site |
|---------------------|----------------------|--------------------|---------------------------------------|
| 03/10/2017 09:10 AM | Heckman, Daniel, M D | Orthopedic Surgery | ST LUKE'S ORTHO SPECIALISTS ALLENT |

Signatures

Electronically signed by : James B Martin, PAC; Jan 27 2017 1:20PM EST

(Author)

Electronically signed by : Daniel Heckman, M.D.; Jan 27 2017 4:55PM EST

(Author)

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Douglas Davis
Medical Records
File No.: 16-6980

#4
Lehigh Valley Pain Ctr.

Patient Name: Davis, Douglas

DOB: 07-18-64

DOI: SF 04-24-16

Facility: Lehigh Valley Pain Center Chiropractic and Rehabilitation

114 N 13 Street Allentown PA 18102 PH: 610-433-3300 Fx: 610-433-3803

Date of Service: 05-02-16

BRIEF HISTORY of MVA:

The patient is a 51 year old male who presents to my office complaining of :

-LEFT ANKLE: Pain = 6-7/10

-LEFT KNEE PAIN: Pain = 6-7/10 but comes and goes with negotiating stairs

-RIGHT KNEE PAIN : Pain = 5/10, More constant than left knee pain

-DESCRIPTION OF OCCURRENCE/MECHANISM OF INJURY:

Patient was on a down escalator and his left shoe got caught causing him to twist and injury his left ankle and right knee.

- ER: YES ☐ NO ☒ NAME OF HOSPITAL:

TREATMENT SUMMARY (FOR THIS INJURY TO DATE):

-None to date

DIAGNOSTIC TESTING SUMMARY FOR THIS INJURY:

-None to date

-PRIOR AND CONCOMITTANT HISTORY:

-PAST INJURY: Laceration to face

-PRIOR SIMILAR SYMPTOMS: Denies

-OTHER: Diabetes, left sided Bell's Palsy, Kidney dz, High Blood Pressure

-SOCIAL HISTORY:

-DRINKS: Occasionally

-SMOKES: Does not smoke

-MARRIED: Yes

-MEDICATIONS:

-RELATED TO THIS INJURY: Yes

-UNRELATED: Yes

-SURGICAL HISTORY: Hernia repairs, abscess removal: chin

WORK STATUS SUMMARY FOR THIS INJURY:

CURRENT WORK STATUS: Disability

Patient Name: Davis, Douglas

DOB: 07-18-64

DOI: SF 04-24-16

Facility: Lehigh Valley Pain Center Chiropractic and Rehabilitation

114 N 13 Street Allentown PA 18102 PH: 610-433-3300 Fx: 610-433-3803

Date of Service: 05-02-2016 (cont.)

PHYSICAL EXAMINATION:

-LEFT ANKLE EXAM 05-02-16: Palpable tenderness is chiefly to the Achilles Tendon. Plantar flexion is somewhat limited with pain to the Achilles. Mild thickening of the tendon is noted as well as heat compared to the right side. Palpable pain is MOD-Severe at the myotendonous junction at the distal gastrocnemius.

-LEFT KNEE EXAM 05-02-16: Palpable tenderness is to the patella and pain is noted deep to patella on compression though Ballotment test is NEG. ROM is full with pain to patella and medial knee on full flexion. No appreciable effusion. Pain increases on weight bearing. NEG Drawer test. POS Patello-femoral test. There is an odd palpable ridge to the left patella in the center which is painful to the touch..

-RIGHT KNEE EXAM 05-02-16: Pain is more general and to this knee, medial, lateral and to the patellar region. FLEXION and EXTENSION are both slightly limited with pain. Palpation reveals medial pain as well as lateral and popliteal pain. DRAWER TEST is NEGATIVE.

DIAGNOSIS:

- M25.562 left knee pain
- M25.561 right knee pain
- S86.002A left Achilles tendon injury

ASSESSMENT:

Post-MVA injuries.

PLAN AND RECOMMENDATIONS:

-99203 New Patient Hist/Exam

-PLAN 04-24-16 : Commence with therapy 3x per week consisting of: extraspinal manipulation; EMS; therapeutic exercises; GOALS include decreasing pain, inflammation, myospasm, paresthesias, crepitation and radiating symptoms while improving ROM, joint spacing, and functional capacity. Other GOALS include referring for diagnostic studies and specialist referrals as necessary.

-RE-EVALUATION: 06-10-16.

-05-02-16 Patient to obtain JC PENNEY insurance info. I am considering XR of both knees and MRI of the left ankle.

Electronically Signed by: C. Paul Garabo, DC, MS

Director of Clinical Services

Lehigh Valley Pain Center Chiropractic and Rehabilitation

Patient Name: Davis, Douglas

DOB: 07-18-64

DOI: SF 04-24-16

Facility: Lehigh Valley Pain Center Chiropractic and Rehabilitation

114 N 13 Street Allentown PA 18102 PH: 610-433-3300 Fx: 610-433-3803

Date of Service: 05-04-16

BRIEF HISTORY of MVA:

The patient is a 51 year old male who presents to my office complaining of :

-LEFT ANKLE: Pain = 6-7/10

-LEFT KNEE PAIN: Pain = 6-7/10 but comes and goes with negotiating stairs

-RIGHT KNEE PAIN : Pain = 5/10, More constant than left knee pain

PHYSICAL EXAMINATION:

-LEFT ANKLE EXAM 05-02-16: Palpable tenderness is chiefly to the Achilles Tendon. Plantar flexion is somewhat limited with pain to the Achilles. Mild thickening of the tendon is noted as well as heat compared to the right side. Palpable pain is MOD-Severe at the myotendonous junction at the distal gastrocnemius.

-LEFT KNEE EXAM 05-02-16: Palpable tenderness is to the patella and pain is noted deep to patella on compression though Ballotment test is NEG. ROM is full with pain to patella and medial knee on full flexion. No appreciable effusion. Pain increases on weight bearing. NEG Drawer test. POS Patello-femoral test. There is an odd palpable ridge to the left patella in the center which is painful to the touch..

-RIGHT KNEE EXAM 05-02-16: Pain is more general and to this knee, medial, lateral and to the patellar region. FLEXION and EXTENSION are both slightly limited with pain. Palpation reveals medial pain as well as lateral and popliteal pain. DRAWER TEST is NEGATIVE.

ASSESSMENT:

Post-MVA injuries.

PLAN AND RECOMMENDATIONS:

-99212 OFFICE VISIT

-PLAN 04-24-16 : Commence with therapy 3x per week consisting of: extraspinal manipulation; EMS; therapeutic exercises; GOALS include decreasing pain, inflammation, myospasm, paresthesias, crepitation and radiating symptoms while improving ROM, joint spacing, and functional capacity. Other GOALS include referring for diagnostic studies and specialist referrals as necessary.

-RE-EVALUATION: 06-10-16.

-05-02-16 Patient to obtain JC PENNEY insurance info.

-05-10-16 ORDERED X-RAYS of Bilateral knees and MRI of the Left ankle

Electronically Signed by: C. Paul Garabo, DC, MS

Patient Name: Davis, Douglas

DOB: 07-18-64

DOI: SF 04-24-16

Facility: Lehigh Valley Pain Center Chiropractic and Rehabilitation

114 N 13 Street Allentown PA 18102 PH: 610-433-3300 Fx: 610-433-3803

Date of Service: 05-18-16

BRIEF HISTORY of MVA:

The patient is a 51 year old male who presents to my office complaining of :

-LEFT ANKLE: Pain = 6-7/10

-LEFT KNEE PAIN: Pain = 6-7/10 but comes and goes with negotiating stairs

-RIGHT KNEE PAIN : Pain = 5/10, More constant than left knee pain

PHYSICAL EXAMINATION:

-LEFT ANKLE EXAM 05-02-16: Palpable tenderness is chiefly to the Achilles Tendon. Plantar flexion is somewhat limited with pain to the Achilles. Mild thickening of the tendon is noted as well as heat compared to the right side. Palpable pain is MOD-Severe at the myotendonous junction at the distal gastrocnemius.

-LEFT KNEE EXAM 05-02-16: Palpable tenderness is to the patella and pain is noted deep to patella on compression though Ballotment test is NEG. ROM is full with pain to patella and medial knee on full flexion. No appreciable effusion. Pain increases on weight bearing. NEG Drawer test. POS Patello-femoral test. There is an odd palpable ridge to the left patella in the center which is painful to the touch..

-RIGHT KNEE EXAM 05-02-16: Pain is more general and to this knee, medial, lateral and to the patellar region. FLEXION and EXTENSION are both slightly limited with pain. Palpation reveals medial pain as well as lateral and popliteal pain. DRAWER TEST is NEGATIVE.

ASSESSMENT:

Post-MVA injuries.

PLAN AND RECOMMENDATIONS:

-99212 OFFICE VISIT

-PLAN 04-24-16 : Commence with therapy 3x per week consisting of: extraspinal manipulation; EMS; therapeutic exercises; GOALS include decreasing pain, inflammation, myospasm, paresthesias, crepitation and radiating symptoms while improving ROM, joint spacing, and functional capacity. Other GOALS include referring for diagnostic studies and specialist referrals as necessary.

-RE-EVALUATION: 06-10-16.

-05-02-16 Patient to obtain JC PENNEY insurance info.

-05-10-16 ORDERED X-RAYS of Bilateral knees and MRI of the Left ankle

-05-18-16 Holding off on therapy pending completion of Dx studies

Electronically Signed by: C. Paul Garabo, DC, MS

MEDICAL BILLS**Client Name: Douglas Davis****Date of Incident: 04/24/2016****File No.: 16-6980**

| | <u>PROVIDER</u> | <u>DOS</u> | <u>CHARGES</u> | <u>PYMT</u> | <u>ADJ</u> | <u>AMT DUE</u> |
|----|---------------------------|-----------------------|-----------------------|--------------------|-------------------|-----------------------|
| 1. | St. Luke's Health Network | 6/24/2016 | \$1,224.00 | \$202.98 | \$1,021.02 | \$0.00 |
| | | 7/13/2016 | \$1,904.50 | \$83.08 | \$1,800.22 | \$21.20 |
| | | 7/24/2016 | \$4,220.40 | \$170.97 | \$3,938.21 | \$113.46 |
| | | 8/5/2016 - 8/10/16 | \$1,340.52 | \$0.00 | \$0.00 | \$1,340.52 |
| 2. | St. Luke's Orthopaedics | 8/3/2016 | \$175.00 | \$102.80 | \$72.20 | \$0.00 |
| | | 12/28/2016 | \$120.00 | \$69.67 | \$50.33 | \$0.00 |
| | | 1/23/2017 | \$1,793.00 | \$653.72 | \$1,139.28 | \$0.00 |
| 3. | C. Paul Garabo, D.C. | 5/2/2016 | \$130.00 | \$0.00 | \$0.00 | \$130.00 |
| | | 5/4/2016 | \$45.00 | \$0.00 | \$0.00 | \$45.00 |
| | | 5/18/2016 | \$45.00 | \$0.00 | \$0.00 | \$45.00 |
| 4. | Open Air MRI of Allentown | 5/16/2016 | \$1,590.00 | \$0.00 | \$0.00 | \$1,590.00 |
| | Totals | | | \$1,283.22 | | \$3,285.18 |

Douglas Davis
Medical Bills
File No.: 16-6980

#1
St. Luke's Health Network



St. Luke's Allentown Campus
1736 Hamilton St
Allentown, PA 18104
TAX ID: 231352213

Remit Payments To:
Lockbox # 8187
PO Box 8500
Philadelphia, PA 19178-8187

Douglas G Davis
1819 GREENLEAF ST
ALLENTOWN, PA 18104

Account #: 11100117593

| | | | |
|-------------------|------------------|-----------------|----------|
| Patient: | Davis, Douglas G | Admission Date: | 06/24/16 |
| Hospital Account: | 11100117593 | Discharge Date: | 06/24/16 |

Services provided at: St. Luke's Hospital - Allentown Campus

Visit Coverages:

MEDICARE - MEDICARE A AND B
BLUE CROSS - MISC BLUE CROSS

Charges

| Service Date | Rev Cd | Service Code | Description | Qty | Amount |
|----------------|--------|--------------|---|-----|----------|
| 06/24/2016 | 0450 | 115990008 | HB EMERGENCY DEPT VISIT (LEVEL 3, INTERMEDIATE) | 1 | 1,224.00 |
| Total charges: | | | | | 1,224.00 |

Payments and Adjustments

| Description | Amount |
|---|-----------|
| MEDICARE INSURANCE PAYMENT - 07/15/16 | -161.72 |
| MEDICARE CONTRACTUAL WRITE-OFF - 07/15/16 | -1,021.02 |
| BLUE CRO INSURANCE PAYMENT - 07/20/16 | -41.26 |
| Total payments and adjustments: | -1,224.00 |

Account Balance: 0.00

Please call Customer Service at 1-800-218-7359

Page: 1 Of 1



St. Luke's Bethlehem Campus
801 Ostrum Street
Bethlehem, PA 18015
TAX ID: 231352213

Remit Payments To:
Lockbox # 8187
PO Box 8500
Philadelphia, PA 19178-8187

Douglas G Davis
1819 GREENLEAF ST
ALLENTOWN, PA 18104

Account #: 10100274128

| | | | |
|-------------------|------------------|-----------------|----------|
| Patient: | Davis, Douglas G | Admission Date: | 07/13/16 |
| Hospital Account: | 10100274128 | Discharge Date: | 07/13/16 |

Services provided at: St. Luke's Moravian

Visit Coverages:

MEDICARE - MEDICARE A AND B
BLUE CROSS - MISC BLUE CROSS

Charges

| Service Date | Rev Cd | Service Code | Description | Qty | Amount |
|----------------|--------|--------------|--|-----|----------|
| 07/13/2016 | 0320 | 255990075 | HB X-RAY EXAM OF KNEE 3 | 1 | 595.10 |
| 07/13/2016 | 0320 | 255990076 | HB X-RAY EXAM KNEE 4 OR MORE | 1 | 693.30 |
| 07/13/2016 | 0320 | 255990082 | HB X-RAY EXAM OF ANKLE (COMPLETE, 3 OR MORE VIEWS) | 1 | 616.10 |
| Total charges: | | | | | 1,904.50 |

Payments and Adjustments

| Description | Amount |
|---|-----------|
| MEDICARE INSURANCE PAYMENT - 08/02/16 | -83.08 |
| MEDICARE CONTRACTUAL WRITE-OFF - 08/02/16 | -1,800.22 |
| Total payments and adjustments: | -1,883.30 |

Account Balance: 21.20

Please call Customer Service at 1-800-218-7359

Page: 1 Of 1



St. Luke's Allentown Campus
1736 Hamilton St
Allentown, PA 18104
TAX ID: 231352213

Remit Payments To:
Lockbox # 8187
PO Box 8500
Philadelphia, PA 19178-8187

Douglas G Davis
1819 GREENLEAF ST
ALLENTOWN, PA 18104

Account #: 11100129566

| | | | |
|-------------------|------------------|-----------------|----------|
| Patient: | Davis, Douglas G | Admission Date: | 07/24/16 |
| Hospital Account: | 11100129566 | Discharge Date: | 07/24/16 |

Services provided at: St. Luke's Hospital - Allentown Campus

Visit Coverages:

MEDICARE - MEDICARE A AND B
BLUE CROSS - MISC BLUE CROSS

Charges

| Service Date | Rev Cd | Service Code | Description | Qty | Amount |
|----------------|--------|--------------|---------------------------------|-----|----------|
| 07/24/2016 | 0610 | 255960019 | HB MRI JNT OF LWR EXTRE W/O DYE | 1 | 4,220.40 |
| Total charges: | | | | | 4,220.40 |

Payments and Adjustments

| Description | Amount |
|--|-----------|
| MEDICARE INSURANCE PAYMENT - 08/12/16 | -170.97 |
| MEDICARE NAA VARIANCE WRITE-OFF (INSURANCE) - 08/12/16 | 1.12 |
| MEDICARE CONTRACTUAL WRITE-OFF - 08/12/16 | -3,937.09 |
| Total payments and adjustments: | -4,106.94 |

Account Balance: 113.46

Please call Customer Service at 1-800-218-7359

Page: 1 Of 1



St. Luke's Allentown Campus
1736 Hamilton St
Allentown, PA 18104
TAX ID: 231352213

Remit Payments To:
Lockbox # 8187
PO Box 8500
Philadelphia, PA 19178-8187

Douglas G Davis
1819 GREENLEAF ST
ALLENTOWN, PA 18104

Account #: 11100142873

| | | | |
|-------------------|------------------|-----------------|----------|
| Patient: | Davis, Douglas G | Admission Date: | 08/05/16 |
| Hospital Account: | 11100142873 | Discharge Date: | |

Services provided at:

Visit Coverages:

MEDICARE - MEDICARE A AND B
BLUE CROSS - CAPITAL BC PLAN 361

Charges

| Service Date | Rev Cd | Service Code | Description | Qty | Amount |
|---------------------------------|--------|--------------|-------------------------------|-----|----------|
| 08/05/2016 | 0420 | 185000019 | HB THERAPEUTIC EXERCISES | 1 | 230.80 |
| 08/05/2016 | 0420 | 185000083 | HB OTHER PT/OT CURRENT STATUS | 1 | 0.01 |
| 08/05/2016 | 0420 | 185000084 | HB OTHER PT/OT GOAL STATUS | 1 | 0.01 |
| 08/05/2016 | 0424 | 185000007 | HB PT EVALUATION | 1 | 417.30 |
| 08/10/2016 | 0420 | 185000019 | HB THERAPEUTIC EXERCISES | 3 | 692.40 |
| Total charges: | | | | | 1,340.52 |
| Total payments and adjustments: | | | | | 0.00 |

Account Balance: 1,340.52

Please call Customer Service at 1-800-218-7359

Page: 1 Of 1

Douglas Davis
Medical Bills
File No.: 16-6980

#2
St. Luke's Orthopaedics

Transaction Search Results

Page 1 of 1

| | | | | | |
|----------------------------------|---------|-------|---------|---------|--|
| Account: DOUGLAS G DAVIS, 384381 | | | | | Demographics Transactions Eligibility Appointments Comments Referrals |
| P Bal | I Bal | W Bal | C Bal | Total | Demand: Billing |
| .00 | 2393.00 | .00 | 1634.00 | 4027.00 | |
| | | | | | New Search Cancel Help |

Account 384381 is in "AGENCY" collection queue. Balance: \$1,634.00

Search criteria: SHS; Account: 384381; Date of Service: 04/24/2016-03/13/2017; All;
 Payer Status: All; Pymt Status: All; Detail; Sort by: Date of Service, Ascending;
 Separate Open and Paid; Prov: DH9; Exclude ATR0;

[Change Search](#)

Transactions

| Charge # | Date | Patient | Prov | POS | Trans/Mod | Pri Dx | Amount | P/A Total | Due | Due From | S |
|-----------------|----------------|---------|------|-------|-----------|--------------|----------------|----------------|------------|----------|---|
| <u>18409921</u> | 08/03/2016 | DOUGLAS | DH9 | 59NFF | 99214 | 71946/M25569 | 175.00 | 175.00 | .00 | CROS/IB | |
| | Pay 08/25/2016 | | | | PMC | | | 81.91 | | | |
| | Adj 08/25/2016 | | | | CMC | | | 70.53 | | | |
| | Adj 08/25/2016 | | | | SEQU | | | 1.67 | | | |
| | Pay 09/01/2016 | | | | PBC | | | 20.89 | | | |
| <u>19520203</u> | 12/28/2016 | DOUGLAS | DH9 | 59NFF | 99213 | 7388/M958 | 120.00 | 120.00 | .00 | CROS/IB | |
| | Pay 01/17/2017 | | | | PMC | | | 55.51 | | | |
| | Adj 01/17/2017 | | | | CMC | | | 49.20 | | | |
| | Adj 01/17/2017 | | | | SEQU | | | 1.13 | | | |
| | Pay 01/26/2017 | | | | PBC | | | 14.16 | | | |
| <u>19719309</u> | 01/23/2017 | DOUGLAS | DH9 | SLAOH | 29879/LT | 71789/M238X2 | 1793.00 | 1793.00 | .00 | CROS/IB | |
| | Pay 02/13/2017 | | | | PMC | | | 520.85 | | | |
| | Adj 02/13/2017 | | | | CMC | | | 1128.65 | | | |
| | Adj 02/13/2017 | | | | SEQU | | | 10.63 | | | |
| | Pay 02/23/2017 | | | | PBC | | | 132.87 | | | |
| | Totals | | | | | | 2088.00 | 2088.00 | .00 | | |

3 matches found

Douglas Davis
Medical Bills
File No.: 16-6980

#3
C. Paul Garabo, D.C.

C. Paul Garabo, D.C.
114 N 13th St
Allentown, PA 18102
(610) 433-3300

STATEMENT

Date: 08/01/2016

Last Claim:

Last Payment:

Last Charge: 05/18/2016

Douglas Davis
1819 Greenleaf St.
Allentown, PA 18102

Patient: Davis, Douglas

Case Type: SF+

Account No: 2952-1

| Date | Dr | Description | Code | Mod | Charge | Credit | Adjust |
|------------|----|--------------------|-------|-----|--------|--------|--------|
| 05/02/2016 | 1 | NP OV Intermediate | 99203 | | 130.00 | .00 | .00 |
| 05/04/2016 | 1 | EP OV Limited | 99212 | | 45.00 | .00 | .00 |
| 05/18/2016 | 1 | EP OV Limited | 99212 | | 45.00 | .00 | .00 |

TOTALS: **\$ 220.00**

For proper credit, please enclose this portion with your payment.

Douglas Davis
1819 Greenleaf St.
Allentown, PA 18102

Statement Date: 08/01/2016

Account No: 2952-1

Balance: \$ 220.00

Pay This Amount: \$.00

Amount Enclosed:
Please fill in amount.

C. Paul Garabo, D.C.
114 N 13th St
Allentown, PA 18102

Date Due: On Receipt

Thank you.

Douglas Davis
Medical Bills
File No.: 16-6980

#4
Open MRI of Allentown

STATEMENT OF ACCOUNT, PAGE 1

OPEN AIR MRI OF ALLENTOWN
1146 S CEDAR CREST BOULEVARD
ALLENTOWN, PA 18103-7938

PATIENT: DOUGLAS G DAVIS
ACCOUNT: 055609
DATE: 08/16/16

DOUGLAS G DAVIS
1819 GREENLEAF STREET
ALLENTOWN, PA 18104

FOR STATEMENT INQUIRIES

610-774-0101, 8:00AM - 4:00 PM
Billing Department

PAY THIS AMOUNT: **\$1,590.00**

INSURANCE PLEASE MAKE CORRECTIONS

AIG87 Aig Claim Services
0344403299UG

Please detach and return this portion with your payment

LOCATION

OPEN AIR MRI OF ALLENTOWN

OPEN AIR MRI OF ALLENTOWN
1146 S CEDAR CREST BOULEVARD
ALLENTOWN, PA 18103-7938

ATTENDING PHYSICIAN

JOEL SWARTZ MD

PATIENT: DOUGLAS G DAVIS

ACCOUNT: 055609

DATE: 08/16/16

ACCIDENT: 04/24/16

**=BILLED TO INSURANCE

| DATE | DIAG | PROC | MOD | PROCEDURE DESCRIPTION | CHARGE | CREDIT | BALANCE |
|----------|---------|-------|-----|------------------------------------|---------|--------|---------|
| 05/16/16 | M25.572 | 73721 | LT | MRI LE ANY JT W/O GAD | 1350.00 | | |
| 05/16/16 | M25.561 | 73564 | RT | XRAY KNEE COMPLETE 4 OR MORE VIEWS | 120.00 | | 1350.00 |
| 05/16/16 | M25.562 | 73564 | LT | XRAY KNEE COMPLETE 4 OR MORE VIEWS | 120.00 | | 120.00 |
| | | | | | | | 120.00 |

Account is past due, please remit payment promptly!
Effective January 1st, 2016 any balance that is over 90 days
will start to accrue interest at a rate of 2.5% on the unpaid balance.

Please call your insurance Re: nonpayment of claim.

| ACCOUNT BALANCE | INSURANCE | PERS. CURRENT | PERS. PAST DUE | PAY THIS AMOUNT |
|-----------------|-----------|---------------|----------------|-----------------|
| 1,590.00 | 0.00 | 0.00 | 1,590.00 | 1,590.00 |